

**“The Kalamazoo Allied Paper Site:
An On-going Adventure
in Wellhead Protection”**

The Site

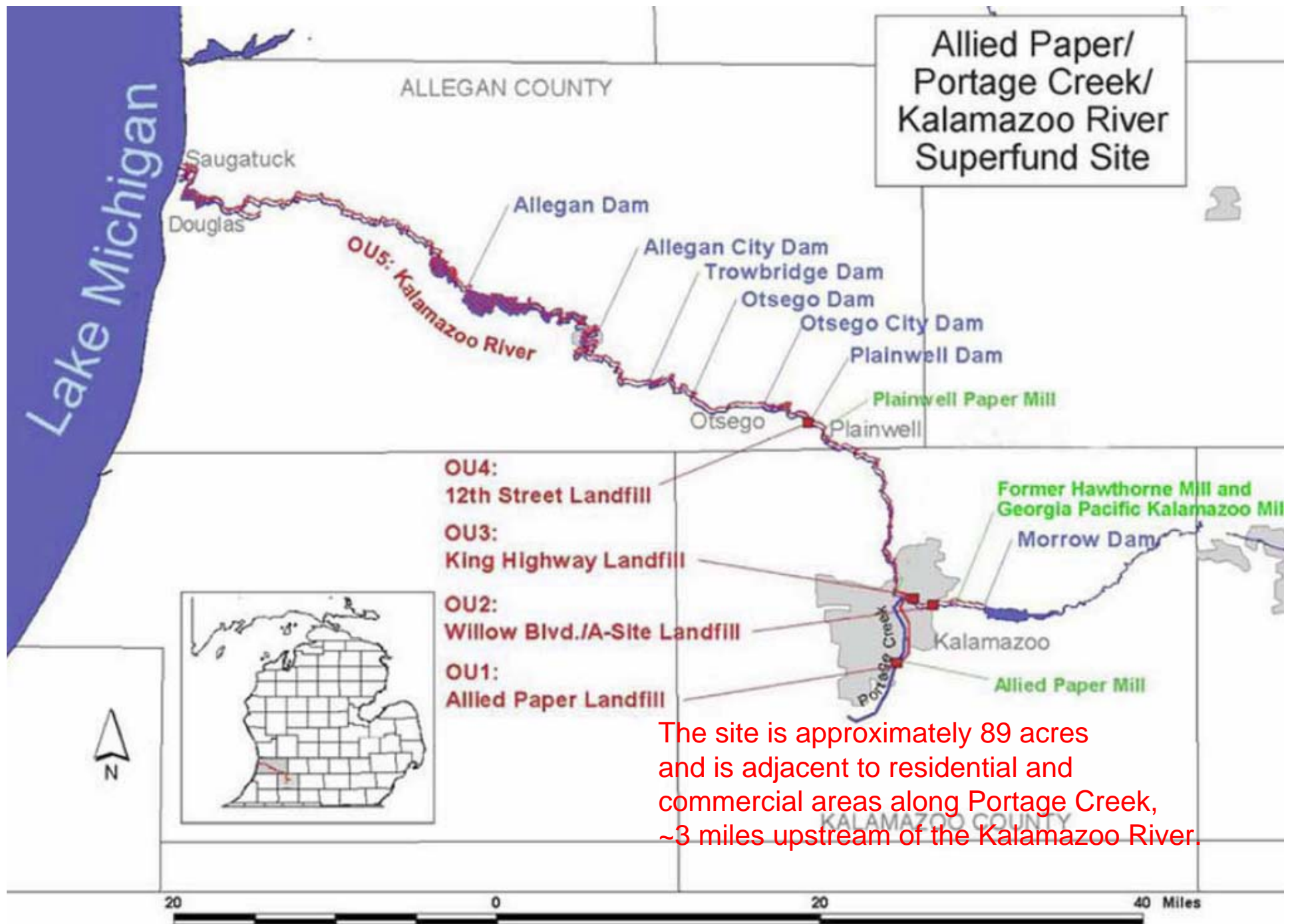


Originally built in the 1890s, abandoned in 1998, Kalamazoo's Allied Paper Mill (a.k.a. Bryant Paper Mill, Performance Papers, Portage Paper) was the original source of PCBs associated with the production of paper.



Allied Site: Part of a Superfund Site

- August 1990, Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund site was officially included on the NPL.
- In Spring of 1997, MDEQ requested that EPA assist them in performing an emergency removal of the PCB contamination in the former Bryant Mill Pond area and Portage Creek.
- June 1998 through May 1999, ~150,000 cubic yards (up to 1,000 ppm) was excavated from the floodplain and placed in dewatering lagoons (HRDL and FRDLs). Interim measures included a “temporary cap” on the lagoon materials, and re-vegetation.
- Post December 1999: Plan to prepare RI/FS for OU-1.
- 2000-2004: Liner cap over lagoons.
- 2001: 2,600 linear feet of sheet-pile/groundwater recovery system along creek, originally designed for geotechnical stabilization.



The site is approximately 89 acres and is adjacent to residential and commercial areas along Portage Creek, ~3 miles upstream of the Kalamazoo River.

unless Superfund cleanup sites are divided into smaller parts called "operable units." The Kalamazoo River site has several OUs

The “News”

ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE: Agreements Will Boost Kalamazoo River Cleanup

This fact sheet is printed on paper made of recycled fibers.

Region 5
Office of Public Affairs (P-18J)
77 W. Jackson Blvd.
Chicago, IL 60604

United States
Environmental Protection
Agency



FIRST CLASS

Upcoming Open House and Public Meeting about Kalamazoo River Superfund Site

Open House

(no formal presentation)

1 - 3:30 p.m.

Plainwell Community Schools
Administration Building Conference Room
600 School Drive
Plainwell

March 15, 2007

Public Meeting

(with formal presentation)

6:30 - 8:30 p.m.

Plainwell High School Cafeteria
684 Starr Rd. (also known as 102nd St.)
Plainwell

EPA will share information about two agreements reached as a result of mediation at both the open house and the meeting. EPA and other officials will be available to answer questions and discuss the Plainwell Impoundment Area and Kalamazoo River site at both the 1 p.m. open house and the 6:30 p.m. meeting. There will also be a formal presentation at the meeting, but not at the open house.

If you have scientific and technical questions about the PCB cleanup of the Plainwell Impoundment Area and Kalamazoo River, you may contact EPA Remedial Project Manager Shari Kolak (contact information on Page 1).

When possible, site information is also posted on the Internet at epa.gov/region5/sites/kalproject



Agreements Will Boost Kalamazoo River Cleanup

Allied Paper/Portage Creek/Kalamazoo River Superfund Site
Kalamazoo, Michigan February 2007

Open house and public meeting

EPA has scheduled an open house followed by a formal public meeting on **March 15** (see locations on back page), so you can learn more about the latest developments in the Kalamazoo River cleanup. At the **open house**, which runs from 1 – 3:30 p.m. at the **Plainwell Community Schools Administration Building**, EPA and other officials will be available to meet one-on-one with the public to discuss the site activities. At the **public meeting** from 6:30 – 8:30 p.m. at the **Plainwell High School Cafeteria**, officials will make a formal presentation about the new agreements and details on the cleanup plans.

If you need special accommodations to attend the open house or public meeting, contact EPA Community Involvement Coordinator Don de Blasio at the contact numbers listed below.

Contact EPA

For more information or if you have comments about the Kalamazoo River cleanup, you may contact these EPA representatives:

Don de Blasio
Community Involvement Coordinator
(312) 886-4360 or (800) 621-8431, weekdays 10 a.m. – 5:30 p.m.
deblasio.don@epa.gov

Shari Kolak
Remedial Project Manager
(312) 886-6151 or (800) 621-8431, weekdays 10 a.m. – 5:30 p.m.
kolak.shari@epa.gov

Samuel Borries
On-Scene Coordinator
(312) 353-8360 or (800) 621-8431, weekdays 10 a.m. – 5:30 p.m.
borries.samuel@epa.gov

Cleanup work will begin soon on the Kalamazoo River, now that two important legal agreements have been signed.

Under the two agreements, known as “administrative orders on consent,” Millennium Holdings LLC and Georgia-Pacific Corp. will perform a cleanup in the Plainwell Impoundment Area, a portion of the Kalamazoo River Superfund site. The two companies will also conduct additional sampling of the river.

The agreements, signed on February 21, 2007, are legally enforceable in court. They are the result of a little over two years of mediated negotiations between the two companies and U.S. Environmental Protection Agency, Michigan Department of Environmental Quality (MDEQ) and the Natural Resource Trustees, which include the Michigan Department of Natural Resources, MDEQ, Michigan Department of Attorney General, National Oceanic and Atmospheric Administration, and the U.S. Fish and Wildlife Service.

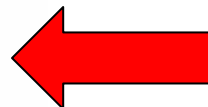
Background

Since November 2004, EPA has been involved in confidential discussions to resolve differences between the mediating parties that were delaying the cleanup and restoration of the Kalamazoo River site. From the beginning, one of the goals of the negotiations was to reach agreement on how best to use the existing data to move forward with cleanup. The parties also needed to determine whether additional investigations were needed before EPA could develop cleanup options for the first reach of the river. One result of the mediation was an agreement for the potentially responsible parties (PRPs) to perform a removal action in the Plainwell Impoundment. Another result was an agreement between EPA and the PRPs to conduct additional sampling throughout the site.

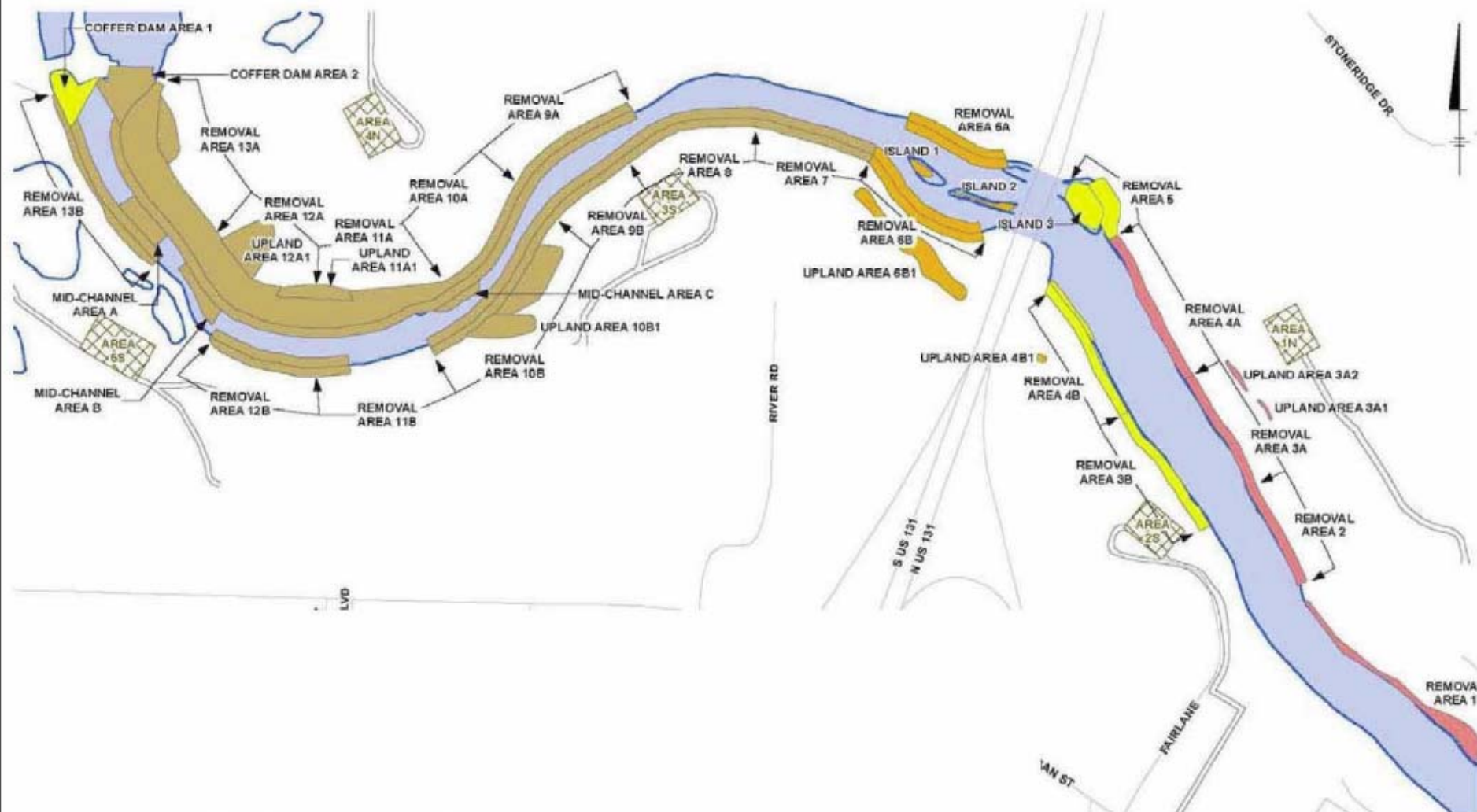
Removal action at Plainwell Impoundment

The PRPs agreed to perform a “time critical removal action” (an accelerated cleanup method used when quick action is needed to clean up hazardous materials) at the Plainwell Impoundment. The Plainwell Impoundment stretches from the Plainwell Dam upstream past U.S. 131 and includes polluted river sediment and banks and floodplain areas.

EPA and MDEQ have approved the engineering design document for the removal action, which is attached to the cleanup agreement and available for review in the site information repositories (see locations on Page 2). The cleanup will include removal of about 132,000 cubic yards of waste material, containing 4,400 pounds of PCBs, from the impoundment area. The estimated cost of the cleanup is \$21 million. If you would like more details on this activity, please see the box on Page 3. This cleanup action will begin this spring.



Targeted Removal Areas—Former Plainwell Impoundment

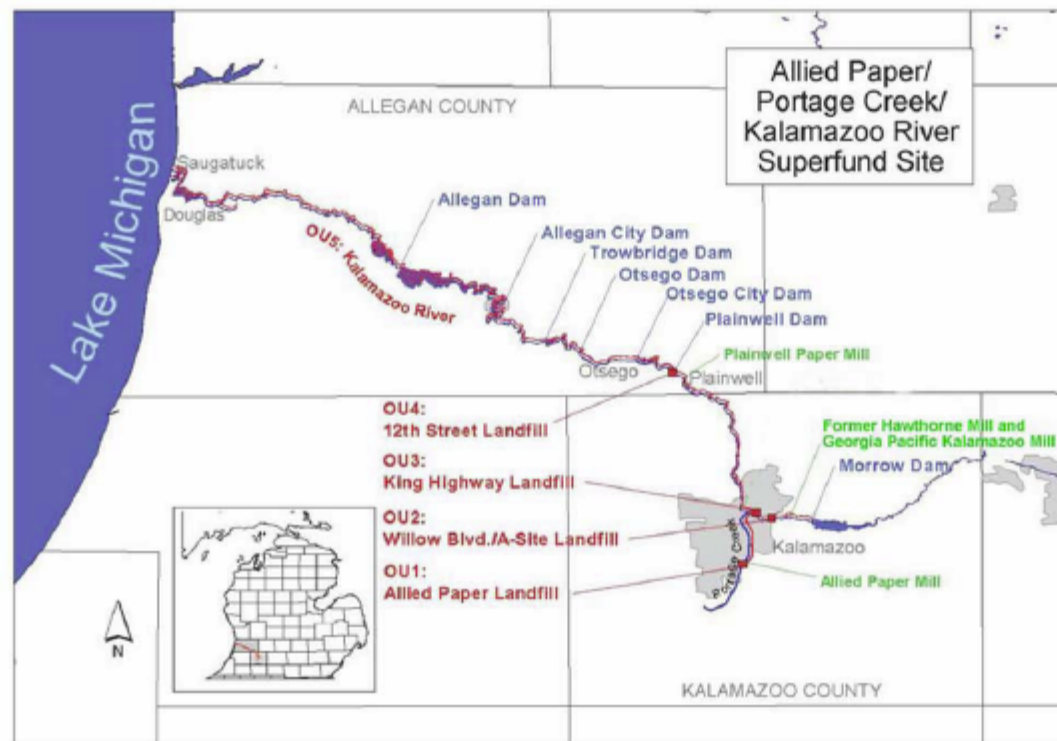


Map courtesy of the Kalamazoo River Study Group

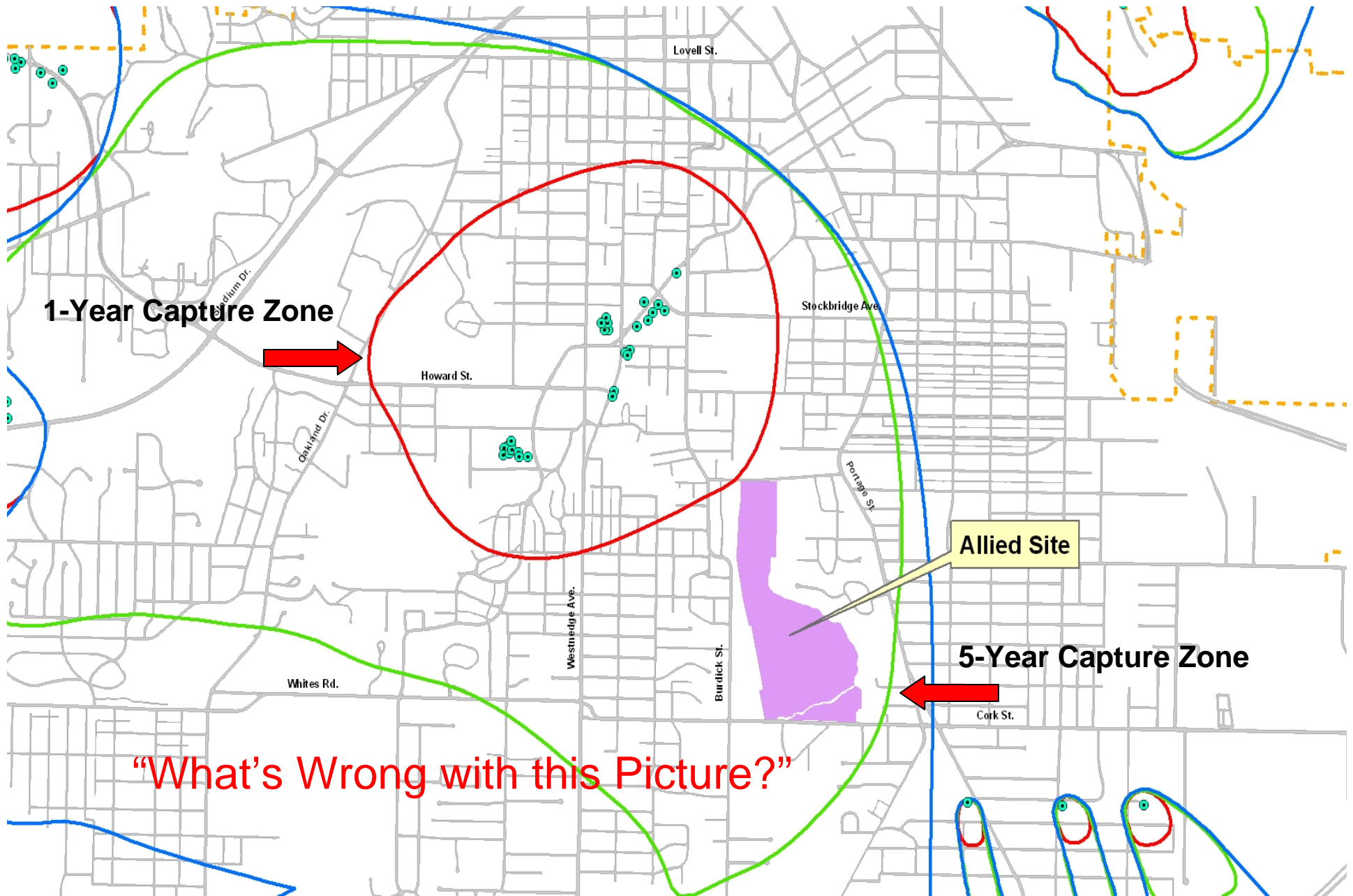
Details of the Plainwell Impoundment cleanup:

- Remove a portion of the Plainwell Dam in order to perform as much as possible dredging of PCB-contaminated sediment "in the dry"
- Dewater portions of the removal area to the extent feasible using coffer dams and a water control structure
- Remove in-stream sediment within 40 feet of existing riverbanks to a cleanup standard of either 1 part per million PCB or, to preserve the streambed, to within six inches of the channel bottom as it existed before the Plainwell Dam was constructed ("parts per million" is abbreviated ppm and is a tiny amount similar to a drop of food dye in 16 gallons of water)
- Implement re-suspension control measures to prevent migration of PCB-contaminated sediment
- Remove flood plain soil where PCBs are present above 50 ppm to achieve a cleanup goal of 5 ppm
- Create a 30-150 foot wide clean buffer along the river
- Create stable riverbanks
- Remove three mid-channel areas that have PCB concentrations greater than 50 ppm
- Remove soil with PCB concentrations greater than 4 ppm from an area of the flood plain near residential properties upstream of U.S. 131
- Dispose of the removed PCB-contaminated sediment and soil at the Allied Paper Landfill
- Create a stable, natural channel and re-vegetate with native plants

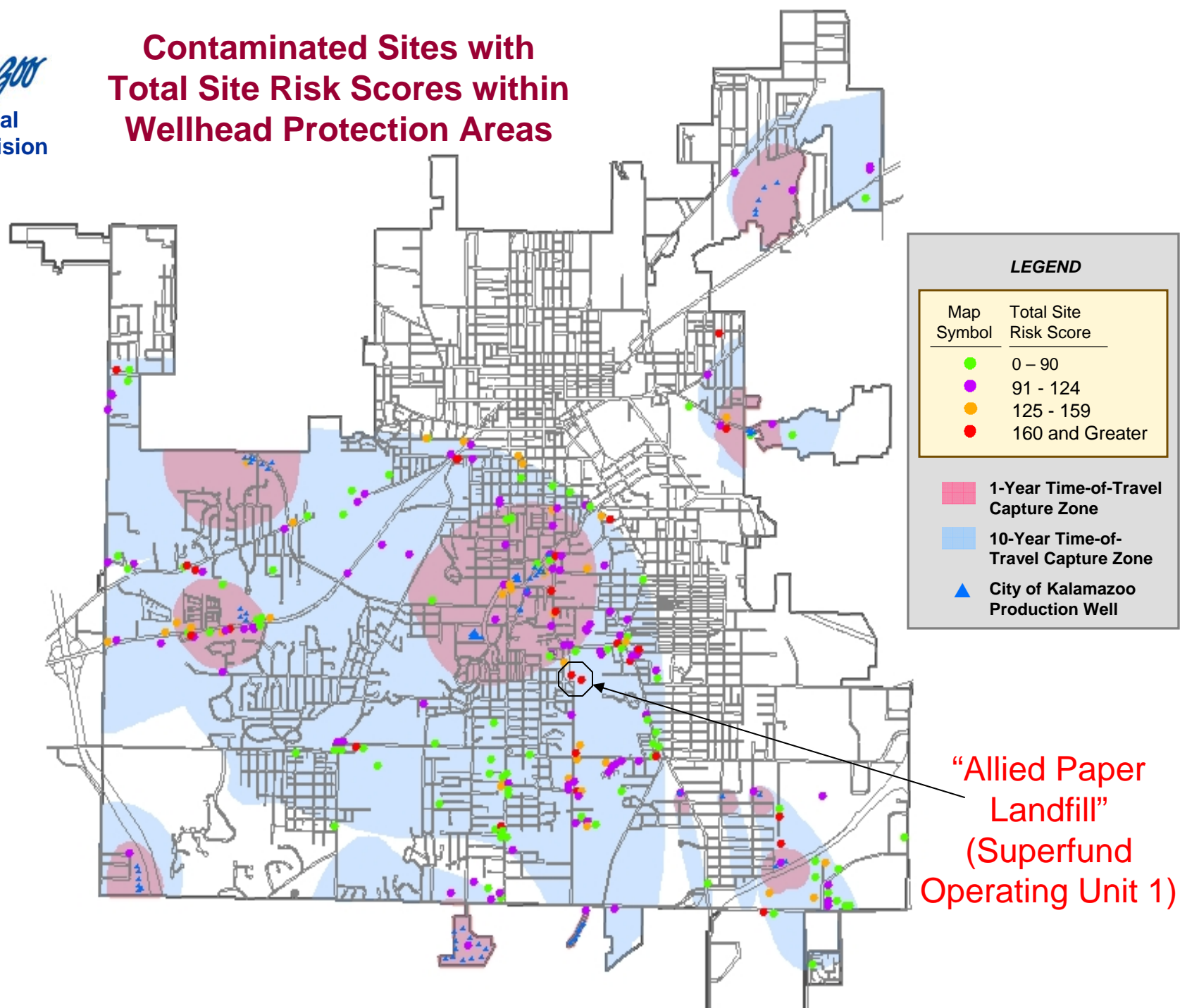
← What?!!

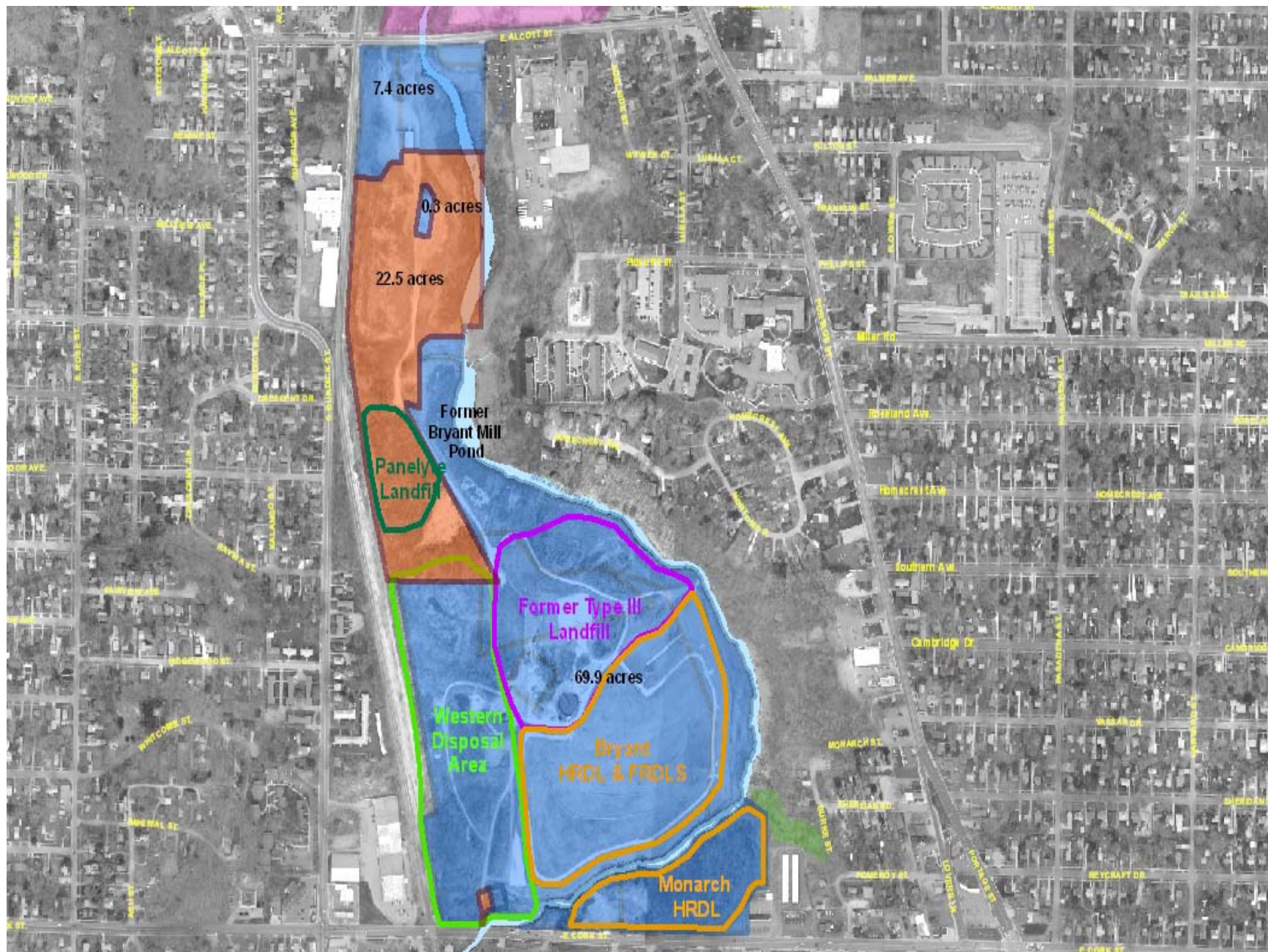


The first battle begins: stop the waste disposal plan!



Contaminated Sites with Total Site Risk Scores within Wellhead Protection Areas





Wellhead Protection Zoning Overlay

Ordinance: Primary Objectives

- **Prevent the creation or establishment of non-compatible land use activities within WHP TOT Capture Zones** that have the potential to contaminate groundwater resources, or prevent/limit the City's ability to obtain necessary State well permits to replace or add wells when necessary
- **Protect designated groundwater supplies from contamination** resulting from spills, leaks, and other releases into groundwater supplies caused by the improper storage, handling, use, production, or discharge of Regulated Substances within WHP TOT Capture Zones by the use of Performance Standards and/or BMPs

Wellhead Protection Zoning Overlay Ordinance: Primary Objectives (Cont.)

- Minimize interruptions to businesses by only **regulating specific land-use activities within specific designated time-of-travel zones, as based upon determined potential risk** to the Public Water Supply System
- **Prevent or minimize public and private losses due to contamination** of the public water supply by avoiding expenditure of public money for costly pollution remediation projects and/or replacement of Public Water Supply System assets

Waste Plan News Hits the Fan!

- **March 7: E-mail from Public Services Director to EPA with list of primary concerns, questions, and comments including: the proposed disposal site was within a 5-Year T.O.T. Capture Zone; lack of controls to ensure non-migration of contaminants; truck traffic through residential area; impacts to flood mitigation plan for earthen dam; proposed disposal area is located between 3 major neighborhoods; unknown effect of 132,000 cubic yards of additional material on current site.**
- **March 15 (morning): Meeting between City of Kalamazoo, USEPA & MDEQ to discuss list of issues.**
- **March 15 (evening): Public Meeting in Plainwell**
- **April 2: Meeting between staff of the City of Kalamazoo, USEPA & MDEQ**

celebrate the vernal equinox at 8:07 tonight
and say goodbye to winter

can affect
than you!

TEEN NEWSBREAK
What's in your kids'
school lunches? **TEEN/AS**

Concerned pet owners
react to food recall **LOCAL/AS**



KALAMAZOO GAZETTE

Tuesday, March 20, 2007

City to fight PCB dumping

EPA to bring contaminated soil from Kalamazoo River to landfill in Milwood neighborhood

By Kathy Aisling
kaisling@kalamazoo gazette.com
388-5598

Kalamazoo city commissioners Monday advocated everything from civil disobedience to a legal fight to stop a federal plan to dump 132,000 cubic yards of sediment containing more than two tons of toxic waste into a

Kalamazoo landfill that officials said isn't licensed to accept even regular household waste.

Bruce Merchant, Kalamazoo public services director, claimed federal Environmental Protection Agency officials have acknowledged they failed to consider the contamination risk to underground aquifers that are tapped by the city of Kalamazoo

to supply water to about 100,000 customers in the Kalamazoo metropolitan area.

City leaders also criticized the EPA for rolling out the plan to dispose of Kalamazoo River sediment laden with polychlorinated biphenyls (PCBs) less than a month before truckloads are scheduled to begin arriving daily at the Allied Paper Inc. landfill,

located in the city between Cork and Alcott streets.

PCBs are "a hazardous substance and probable human carcinogen," according to the EPA cleanup plan online.

City Manager Ken Collard called it "disconcerting" that negotiations on the Kalamazoo River cleanup have apparently gone on behind closed doors with

no opportunity thus far for public comment. Collard said local officials have been told transporting the contaminated riverbed waste to a Detroit-area facility licensed to accept toxic substances would add another \$14 million, a cost Collard said federal officials feel is prohibitive.

Please see CMT, A2

Allied Paper Inc.



On the Web

The EPA plan: www.epa.gov/region5/perfund/hg/MDC06007308.htm

Spartan buying Felpausch grocery chain

THE HOLE STORY



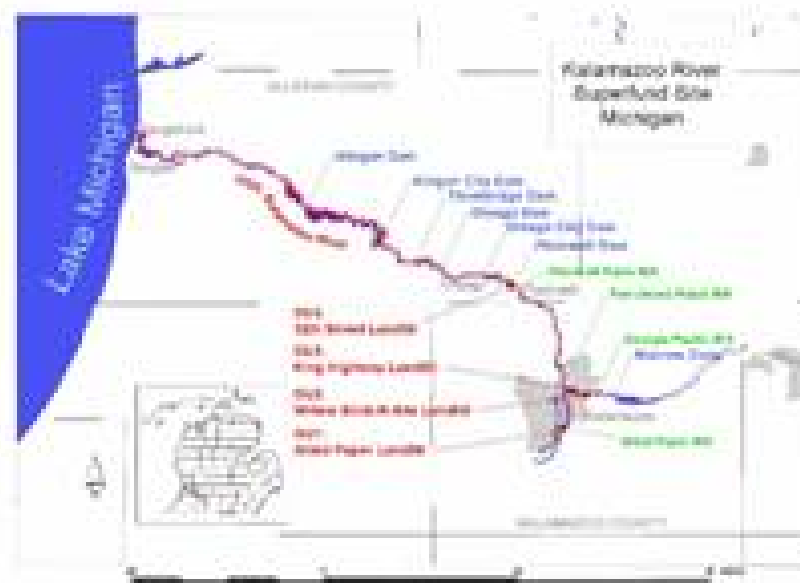
CITY IDENTIFIED ISSUES/CONCERNS REGARDING DISPOSAL PLAN

(A Sampling of a 10-Page Table)

- The proposed disposal site (“Allied Paper Site”) of 132,000 cubic yards of PCB-laden river sediment is **within a 5-year T.O.T. Capture Zone** (disconnect within MDEQ R & R and Water regarding drinking water pathways).
- **The site has been identified on a number of State and Federal Sites of Environmental Contamination.** The site was termed a “temporary” disposal area for the ~150K cubic yards of PCB laden sediment in 1998/99. It should be adequately/permanently cleaned up and formally closed, not deliberately exacerbated by adding additional contaminated material.
- The disposal plan and use of the site as a landfill is contrary to the recommended management strategies for WHPAs (**Landfills = high risk to groundwater**).
- The **proposed disposal area is not a licensed landfill** nor do we think it meets the alternative “applicable or relevant and appropriate requirements (ARARs)” such as TSCA criteria (lined landfill). No scientific validation of the site to determine that no adverse risk to groundwater would occur. **Other appropriate licensed and permitted landfills already existed as alternative disposal areas.**
- Also, numerous questions raised regarding **site characteristics**.
- **No justification of “Time Critical Removal Action.”**
- **EPA did not follow its own “Superfund Community Involvement Handbook.”**
- What about the evaluation of the livability issue of the affected **neighborhoods**, the **past state and federal funding** already invested in this area, and **“Environmental Justice”**?

PCBs, Kalamazoo River and SuperFund Information

PCB Forum, April 12, 2007 Western Michigan University



Dr. Charles Presentation

Dr. Duane Hampton Presentation

KRWC

Presentation

EPA/MDEQ Presentation

**Kalamazoo River cleanup delayed; additional community
input planned**

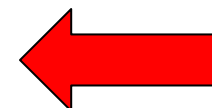
Release date: 04/13/2007

Contact Information: (EPA) Mick Hans, (312) 353-5050,
hans.mick@epa.gov (MDEQ) Bob McCann, (517) 241-7397

CONTACT: (EPA) Mick Hans, (312) 353-5050,
hans.mick@epa.gov
(MDEQ) Bob McCann, (517) 241-7397

FOR IMMEDIATE RELEASE
No. 07-OPA059

(Chicago, Ill. - Apr. 13, 2007) U.S. Environmental Protection
Agency Region 5 today announced **it would delay until May 5
the start of Superfund cleanup activity** at the Plainwell Dam,
in Plainwell, Mich.

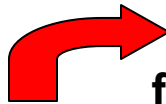


Over the next several weeks, EPA, in consultation with Michigan
Department of Environmental Quality, will seek community input
on plans to dispose of PCB-contaminated sediment excavated
from the Kalamazoo River at the Allied Paper landfill in
Kalamazoo.



**"Kalamazoo Mayor McKinney and other elected officials and
residents have made it clear that they have concerns and
need more information about the sediment disposal plans,"**
said Regional Administrator Mary Gade. "We are fully confident
that the cleanup and disposal approach announced on February
28th is safe and effective, and will bring momentum to cleanup
of the

4/17/07 – UPDATE: City of Kalamazoo citizens, elected officials, staff, and neighborhood representatives continue to fight the proposed disposal of 132,000 cubic yards of PCB contaminated sediments at the Allied Paper Disposal site between Alcott and Cork Streets.

 **Citizen involvement, including extensive letter writing to state and federal officials, has caused the U.S. EPA to implement a three-week moratorium on all activities at the Plainwell Impoundment and the Allied Paper Disposal site. MDEQ and U.S. EPA are scheduled to meet with City of Kalamazoo elected officials and staff on Wednesday, April 18, 2007. Your continued involvement is needed to make this moratorium permanent.**

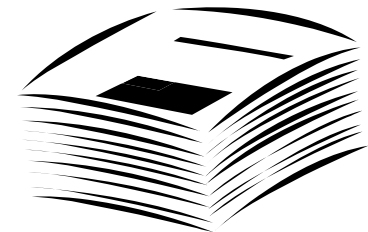
Concerned citizens are urged to continue to contact their elected representatives and encourage them to continue to question this unreasonable “solution” to a long-term problem. For more details on the specific aspects of this project visit the EPA’s [Kalamazoo River Cleanup website](#).

Also, you can view the letters that Mayor Hannah McKinney has recently sent to US [Senator Carl Levin](#) (.pdf) and [Richard Karl](#) (.pdf), Director of the US EPA Region 5 Superfund Division.

Below is a list of representatives that you can contact on this topic: [http://weblink](#)

COMMUNICATION (Cont.)

- March/April: Discussions between City staff & MDEQ Drinking Water staff
- April 18: Meeting between Officials of the City of Kalamazoo & MDEQ
- April 18: Letter from City of Kalamazoo Mayor to MDEQ Director
- April 18: Letter from City of Kalamazoo Manager to MDEQ Director
- April: Letters and support from U.S. Senator Debbie Stabenow & other politicians to EPA
- April: Numerous letters from Kalamazoo Environmental Justice Coalition & RESPECT to numerous community organizations and officials





Kalamazoo River update: new plan for 2007 dredge disposal announced

Release date: 04/25/2007

Contact Information: Anne Rowan, 312-353-9391, rowan.anne@epa.gov Mick Hans, 312-353-5050, hans.mick@epa.gov
(MDEQ) Bob McCann, 517-241-7397

FOR IMMEDIATE RELEASE

No. 07-OPA068

(Chicago, Ill. - April 25, 2007) U.S. Environmental Protection Agency Region 5 today announced a tentative agreement with two companies that **PCB-contaminated sediment removed this year from an area around the Plainwell Impoundment will not be sent to the Allied Paper disposal area in Kalamazoo, Mich.**



"EPA has clearly heard the concerns of Kalamazoo officials and residents," said Regional Administrator Mary Gade. "This agreement allows more time to better address local concerns about disposal without further delaying the time-critical cleanup work at the Plainwell Impoundment."



No determination has been made regarding a disposal site or sites for material excavated during 2008. EPA will solicit public input on all disposal options considered.

"The agreement ensures this important cleanup project will move forward while addressing the concerns that we have heard," said Steven E. Chester, director of the Michigan Department of Environmental Quality. "I look forward to keeping an open dialogue with the community as we continue our efforts to restore the Kalamazoo River."

The 2007 cleanup work - which was halted on April 13 to allow for additional community input - will resume on May 2. EPA expects that about one-third of the sediment will be removed during 2007. Under the new plan, material excavated from the river during 2007 will be sent to permitted commercial landfills.

The alternative plan for 2007 was proposed by Georgia-Pacific and Millennium Holdings. The companies agreed to perform the \$21-25 million cleanup under EPA and Michigan DEQ oversight earlier this year. The government agencies and companies agreed to the new disposal approach this week. A variety of technical, logistical and financial details will be addressed over the next few weeks.



MEET YOUR NEXT

Forget 'American Idol.' Check out Hometown Idol.
Meet this year's finalists inside your ticket.

HEAR THEM FIRST: After you read about
and let them audition for you at www.m

KALAMAZOO GAZE

Thursday, April 26, 2007

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ana G. Parikh
lanarogarehe.com
358-8558

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"In 2006, a lot of our com-
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bled. Nearly every com-
pany in medical devices
closed off their guidance
forecast for the
year," Stephen P. MacMill-
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the company's annual
earnings.

25 Fortune 500 companies
six consecutive years of
growth.

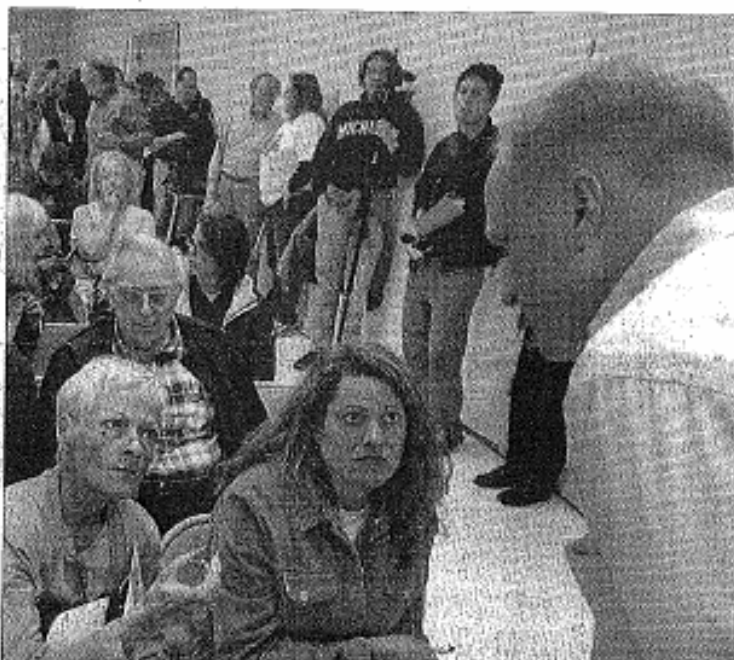
Please see COMPANY, A2

5 as of 6 a.m.

ed

No PCBs coming to city this year

Activism alters EPA plan to dump in Kalamazoo



QUOTE

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Fred U

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"We want
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First battle
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Welcome to RESPECT Kalamazoo

[Welcome](#)

[Info About The Situation](#)

[Join Us](#)

[Contacts to Stop The EPA](#)

[Updates](#)



STOP
THE
EPA
NOW!



RESPECT KALAMAZOO

Responsible Environmental Strategy and Planning for Effective Confrontation against Toxics

Mission Statement:

RESPECT is a collective group of concerned citizens committed to a total moratorium on disposals at the Allied site and a complete and appropriate cleanup of all PCB contaminated areas in the Kalamazoo River Environment.

We demand a permanent solution NOW!

The EPA will not be dumping at the Allied Site!

Congrats, we all won a huge battle

but the war is not over!

Kalamazoo River update: Plainwell dredging begins this week

Release date: 06/05/2007

Contact Information: Mick Hans, 312 353-5050, hans.mick@epa.gov

FOR IMMEDIATE RELEASE

No. 07-OPA092

CHICAGO (June 5, 2007) - U.S. Environmental Protection Agency Region 5 announced today that dredging of PCB-contaminated sediment near the Kalamazoo River's Plainwell Impoundment would begin this week. Dredging equipment is expected to be visible on the river by June 7.

EPA and Michigan Department of Environmental Quality will oversee the work of contractors hired by two responsible parties: Georgia-Pacific and Millennium Holdings. The 2007 dredging work will continue through the fall, weather permitting.

The two-year \$25 million cleanup agreement among EPA, MDEQ and the responsible parties was announced Feb. 28. An estimated 132,000 cubic yards of sediment will be removed from a 1.5-mile area extending upstream of the Plainwell Dam. A second agreement, between EPA and the two companies, requires the companies to perform about \$15 million in additional environmental sampling and investigation throughout the 80-mile Kalamazoo River Superfund site.



Sediment removed from the river will be separated into two waste streams. During 2007, material with PCB content above 50 parts per million will be sent to Environmental Quality Co.'s Wayne Disposal Landfill in Belleville, Mich. Wayne Disposal is a permitted chemical waste landfill that already receives similar material. The dredged sediment containing less than 50 parts per million PCBs is considered non-hazardous solid waste. It will be sent to Allied Waste's C and C Landfill near Marshall, Mich., which is also a permitted commercial disposal facility. Disposal locations for the 2008 dredging have not yet been determined.

**Informational open houses on Kalamazoo River cleanup June 27,
1:30 p.m. and 6:30 p.m.**

Release date: 06/14/2007

Contact Information: Mick Hans, 312-353-5050, hans.mick@epa.gov Don
de Blasio, 312-886-4360, deblasio.don@epa.gov

FOR IMMEDIATE RELEASE

No. 07-OPA099

Chicago, Ill. - June 13, 2007) U.S. Environmental Protection Agency
Region 5 is holding two open house sessions June 27 on the Kalamazoo
River cleanup. Both will be at the Comfort Inn, 622 Allegan St., Plainwell,
Mich. Residents are invited to drop by from 1:30 to 3 p.m. or 6:30 to 8 p.m.

The sessions will be identical. No formal presentation is planned. State
and local officials may also attend.

If special accommodations are needed, contact EPA community
involvement coordinator Don de Blasio by June 20 at 800-621-8431, ext.
64360 (weekdays, 10 a.m. to 5:30 p.m.), or deblasio.don@epa.gov.

EPA-overseen dredging of PCB-contaminated sediment near the Plainwell
Impoundment began last week. The project is expected to continue
through fall 2008. Site information including new photos is posted at
<http://www.epa.gov/region5/sites/kalproject> .

Kalamazoo River cleanup update: 2008 Disposal Plans; Open House Aug. 22

Release date: 08/02/2007

Contact Information: Don de Blasio, 312-886-4360, deblasio.don@epa.gov

FOR IMMEDIATE RELEASE

No. 07-OPA135

CHICAGO (Aug. 2, 2007) - **U.S. Environmental Protection Agency Region 5 today announced an agreement with Millennium Holdings and Georgia-Pacific that requires Kalamazoo River sediment dug up in the ongoing Plainwell Dam cleanup in 2008 be sent to a commercial landfill for disposal. **Second battle won...****



EPA and Michigan Department of Environmental Quality's oversight of the 2007 PCB-contaminated sediment dredging is on schedule. Before work resumes in the spring of 2008, the two companies will recommend to EPA commercial disposal facilities that have the proper permits to handle contaminated sediment removed from the river. Hazardous waste will be separated from waste not regulated by the Toxic Substances Control Act, a practice currently in effect.

Open-house-style update meetings to discuss the dredging will be held 1:30 to 3 and 6:30 to 8 p.m., Wednesday, Aug. 22, at Comfort Inn, 622 Allegan St., Plainwell. Residents who need special accommodations at the meeting may contact EPA Community Involvement Coordinator Don de Blasio at 800-621-8431, ext. 64360, 10 a.m. to 3:45 p.m. weekdays, or deblasio.don@epa.gov.

Dredging work began in early June. As of the last week of July, nearly 6,200 cubic yards of material had been removed from the river and nearby banks. Of that total, about 1,035 cubic yards of sediment with PCBs above 50 parts per million was sent to Environmental Quality Co.'s Wayne Disposal Landfill in Belleville, Mich. Another 5,145 cubic yards of sediment with less than 50 parts per million PCBs, which is considered non-hazardous solid waste, was sent to Allied Waste's C and C Landfill near Marshall, Mich. More than 180 truckloads of sediment have been hauled out of the site.



Millennium Holdings and Georgia-Pacific will begin work later this year on a thorough investigation of PCB contamination along the entire 80-mile Kalamazoo River Superfund site. This is an effort to identify where PCBs are located and the extent of the contamination.

PCBs, or polychlorinated biphenyls, are a group of toxic chemicals that were widely used in carbonless copy paper and as coolants, insulators and lubricants. PCBs are of concern because they concentrate in the food chain resulting in health hazards to people, fish and wildlife. Congress banned the manufacture of new PCBs in 1976 and PCBs still in use are strictly regulated.



Plainwell PCB Cleanup Proceeding on Schedule

Allied Paper/Portage Creek/Kalamazoo River Superfund Site
Kalamazoo, Michigan August 2007

Informational open houses

EPA is holding two open house sessions Aug. 22 so you can learn more about activities under way on the Kalamazoo River cleanup. Both will be at the Comfort Inn, 622 Allegan St., Plainwell, Mich. People can attend either identical session from 1:30-3 p.m. or 6:30-8 p.m. No formal presentations are planned. EPA representatives and other officials will be available to meet one-on-one with the public to discuss site activities. If special accommodations are needed, contact EPA Community Involvement Coordinator Don de Blasio at 800-621-8431 Ext. 64360 (weekdays, 10 a.m. to 5:30 p.m.), or deblasio.don@epa.gov by Aug. 15.

Contact EPA

For more information, or if you have comments about the Kalamazoo River cleanup, you may contact these EPA representatives:

Don de Blasio

Community Involvement Coordinator
312-886-4360 or 800-621-8431,
weekdays 10 a.m. - 5:30 p.m.
deblasio.don@epa.gov

James Saric

Remedial Project Manager
312-886-0992 or 800-621-8431,
weekdays 10 a.m. - 5:30 p.m.
saric.james@epa.gov

Samuel Borries

On-Scene Coordinator

312 353 9260 or 800 621 8431

U.S. Environmental Protection Agency Region 5 and state partner Michigan Department of Environmental Quality continue to oversee this summer's dredging at the Plainwell Impoundment on the Kalamazoo River. The cleanup work is being performed by contractors hired by responsible parties Millennium Holdings LLC and Georgia-Pacific LLC. Dredging is proceeding on schedule and since work began in early June, nearly 6,200 cubic yards or 180 truckloads of PCB-contaminated sediment (mud) have been removed from the river and nearby banks. PCBs are polychlorinated biphenyls, a chemical compound commonly used by industry that at high concentrations and exposures can cause illness in humans and wildlife.

The Plainwell waste is being divided into sediment containing 50 parts per million (ppm) or more of PCBs and material with lower concentrations. Under the federal Toxic Substances and Control Act, EPA regulates the use, storage and disposal of sediment with PCB concentrations exceeding 50 ppm. One part PCB per million parts sediment is a tiny amount, similar to one second in 12 days. Of the total removed so far, about 1,035 cubic yards of sediment with PCBs above the 50 ppm level have been sent to Environmental Quality Co.'s Wayne Disposal Landfill in Belleville, Mich. Another 5,145 cubic yards of sediment with less than 50 ppm PCBs, which is considered nonhazardous waste, have been sent to Allied Waste's C and C Landfill near Marshall, Mich.

Under an agreement this spring between EPA and the responsible companies, Kalamazoo River sediment dug up in the Plainwell Impoundment cleanup next year will be sent off-site to commercial landfills for disposal. Before the Plainwell dredging work resumes in the spring of 2008, Millennium Holdings and Georgia-Pacific will recommend for EPA approval commercial disposal facilities that hold the proper permits to handle the contaminated sediment removed from the river. Those facilities have not yet been identified as the responsible parties negotiate with disposal companies. When completed, the Plainwell cleanup will have removed about 132,000 cubic yards of sediment containing 4,400 pounds of PCBs. The estimated cost of the removal action is \$30 million and is expected to continue through the fall of 2008. Site information including new photos is posted at www.epa.gov/region5/sites/kalproject.

Supplemental sampling project

EPA cleanup projects performed under the Superfund program sometimes include both near-term and long-term activities. On the Kalamazoo River site, short-term cleanups — like the Plainwell dredging — are coordinated

Next battle
begins....

The
Remedial
Investigation
Report ("RI")



removal projects are done when scientists conclude contamination threatens people and wildlife with imminent exposure to dangerous substances. The PCBs lying unprotected in the mud of the Plainwell Impoundment are thought to pose just such a threat to people and to animals that eat fish that have swallowed the chemical compound.

While the Plainwell dredging proceeds, the Superfund remedial process continues on other sections of the river. Under another agreement with EPA, Millennium Holdings and Georgia-Pacific will pay for a \$15 million supplemental sampling and analysis project along the entire 80-mile length of the site. The Kalamazoo River Superfund area stretches from Saugatuck on Lake Michigan to the Morrow Dam. EPA believes this additional sampling and analysis must be completed before any final cleanup decisions can be made for the Kalamazoo River. The sampling in this comprehensive project will initially target the river reach between the Morrow and Plainwell dams, including Portage Creek. The study will identify the extent and location of PCB contamination along the river.

Other cleanup actions

In addition to the removal action at the Plainwell Impoundment, cleanup developments on other parts of the Kalamazoo River site this summer include:

- EPA is reviewing an MDEQ study on the nature and extent of contamination at the Allied Paper Landfill. When the review is completed this fall, the potentially responsible parties will use the study to develop cleanup alternatives for the landfill. After the alternatives are developed, EPA will issue a document called a proposed plan that will be made available for public review and comment.
- For the Willow Boulevard/A-Site Landfill, EPA has begun negotiations with the potentially responsible parties for designing and implementing the cleanup plan developed for the landfill. Work on the cleanup plan, which includes capping the landfill and installing a monitoring network, is expected to begin in 2008.
- Weyerhaeuser has begun work on the erosion control system at the 12th Street Landfill under the terms of its agreement with EPA to design and implement the cleanup remedy for this part of the Kalamazoo River site. Weyerhaeuser will dig up contaminated sediment from the channel next to the landfill, place

The new slope will be constructed to prevent erosion of the landfill when the river is rerouted to its original channel, which is part of the design for the Plainwell Impoundment removal action.

- Weyerhaeuser has also agreed—to investigate and clean up the Plainwell Mill property—to remove PCB-contaminated floodplains on the river banks adjacent to the mill. EPA and MDEQ are reviewing plans for an in-depth examination of the nature and extent of hazardous waste at the Plainwell Mill.
- Georgia-Pacific completed the removal of hazardous waste from certain areas of its Kalamazoo mill and sediment from nearby floodplains. Most of this waste was consolidated with the material in the Willow Boulevard/A-Site Landfill and will be capped as part of the final cleanup for that part of the Kalamazoo site.

Information libraries

The public can read documents related to the Kalamazoo River Superfund site at the following places:

Kalamazoo Public Library

315 S. Rose St.
Kalamazoo

Charles Ransom Library

80 S. Sherwood Ave.
Plainwell

Allegan Public Library

331 Hubbard St.
Allegan

Otsego District Library

219 S. Farmer St.
Otsego

Saugatuck-Douglas Library

10 Mixer St.
Douglas

Waldo Library

Western Michigan University
903 W. Michigan Ave.
Kalamazoo

Informational open houses on Kalamazoo River cleanup Nov. 7, 1:30 p.m. and 6:30 p.m.

Release date: 10/29/2007

Contact Information: Mick Hans, 312-353-5050, hans.mick@epa.gov Don de Blasio, 312-886-4360, deblasio.don@epa.gov

FOR IMMEDIATE RELEASE

No. 07-OPA200

CHICAGO (Oct. 29, 2007) - U.S. Environmental Protection Agency Region 5 is holding two open house sessions Wednesday, Nov. 7, on the Kalamazoo River cleanup. Both will be at the Comfort Inn, 622 Allegan St., Plainwell, Mich. Residents are invited to drop by from 1:30 to 3 p.m. or 6:30 to 8 p.m.

The sessions will be identical. A formal update presentation will begin at 1:45 and 6:45 p.m., followed by time to meet one-on-one with EPA, Michigan and local officials.

If special accommodations are needed, contact EPA community involvement coordinator Don de Blasio by Oct. 31 at 800-621-8431, Ext. 64360 (weekdays, 10 a.m. to 5:30 p.m.), or deblasio.don@epa.gov.

EPA-overseen dredging of PCB-contaminated sediment near the Plainwell Impoundment will wrap up for the season in a few weeks. The project is expected to continue through fall 2008. Site information including photos is posted at <http://www.epa.gov/region5/sites/kalproject>.

NOTE

On November 6, a meeting between EPA and the Allied Site Task Force (KRW, COK, KC, COC, KRCC, CUD, KEC, HHNA, WMU) was held regarding: time-table for the completion & review of Draft RI prior to starting FS (MDEQ recommendation 6-07), and input process for FS.



Plainwell PCB Cleanup Progress, Updates, and Public Meeting

Allied Paper/Portage Creek/Kalamazoo River Superfund Site
Kalamazoo, Michigan March 2008

Informational open house

EPA is holding an open house Wednesday, April 2, so you can learn more about the latest developments in the Kalamazoo River cleanup.

The open house will be at 6:30 p.m. at the Comfort Inn and Conference Center, 622 Allegan St., Plainwell, Mich. A formal presentation will be at 6:45 p.m.

EPA representatives and other officials will make a formal presentation and be available to discuss site activities with you individually. If you need special accommodations, contact EPA Community Involvement Coordinator Don de Blasio (see below) by March 28.

Contact EPA

For more information, or if you have comments about the Kalamazoo river cleanup, contact:

Don de Blasio

Community Involvement Coordinator
EPA Region 5 (P-19J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590
312-886-4360 or 800-621-8431

Cleanup work on the Kalamazoo River began in early March for the 2008 construction season. This starts the second year of an estimated two-year project to remove 120,000 cubic yards of sediment (mud) containing 4,400 pounds of PCBs from the Kalamazoo River's Plainwell Impoundment. Contractors hired by Millennium Holdings LLC and Georgia-Pacific LLC are doing the work. The two companies are legally responsible for the pollution.

Polychlorinated biphenyls, better known as PCBs, are chemical compounds with common industrial uses. At high concentrations and exposures they can cause illness in humans and wildlife (see box on page 3).

In 2007, more than 37,000 cubic yards or 1,059 truckloads of PCB-contaminated sediment were removed from the river and nearby banks. So far, workers have removed sediment and restored the banks along some 7,800 feet of river bank. This includes removal areas 1, 2, 3A and B, 4A and B, 5, 6A and B, 7 and 8 (see map on page 2). They have completed work in the Phase 1 cofferdam area with construction of the western water diversion structure (Phase 1 cofferdam), which maintains the current flow of the river over the eastern spillway area. This allowed workers to dredge behind the dam, build a water control structure, and remove the portion of the dam in the former powerhouse area.

Phase 2 (2008) work will include excavation within removal areas 9 through 13, removing the Phase 1 cofferdam, and constructing a Phase 2 cofferdam system just upstream of the dam to allow drawdown/dewatering, followed by excavation of sediment from behind the eastern portion (spillway) of the dam. Some 83,000 cubic yards of PCB-contaminated sediment will be removed this year. The water control structure which was constructed during Phase 1 will remain in place in the western channel as a means of managing the water level in the impoundment to facilitate the dredging operations. After the mid-channel and near-shore sediment removal activities are complete, the water control structure will be removed, allowing the Kalamazoo River to flow freely



Removing vegetation and contaminated soil

Update for the landfills

In addition to the removal action at the Plainwell Impoundment, cleanup developments on other parts of the Kalamazoo River site are occurring.

- MDEQ is finalizing a cleanup investigation at the Allied Paper Landfill. Copies of the study will be given to members of the public and the city of Kalamazoo. EPA met with the city and will be working with them to make sure the study considers all issues deemed important by the city. Shortly after the public meeting, EPA will be engaging with the public on reuse ideas.

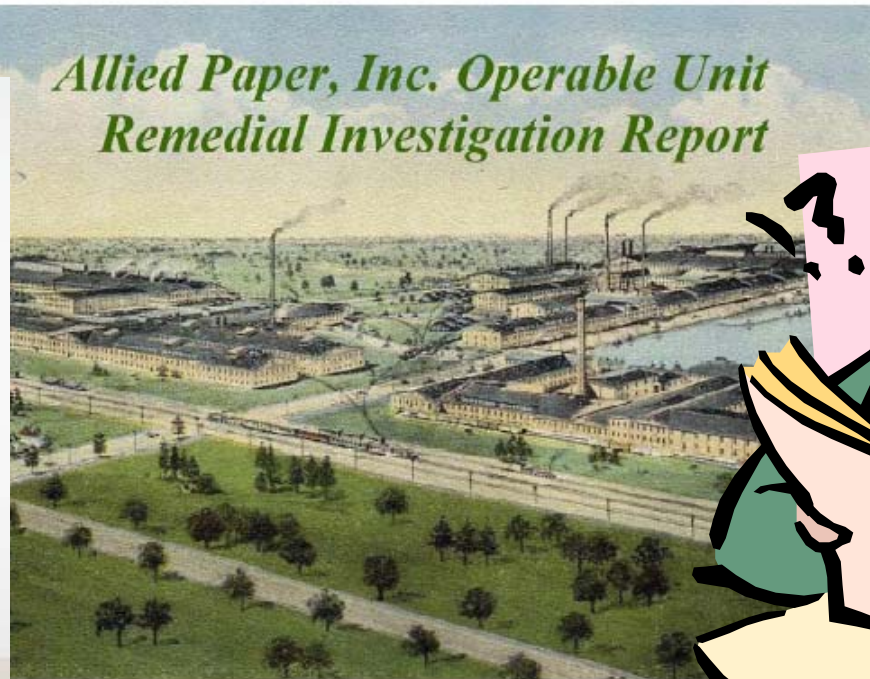
- After completing the emergency action to excavate residuals out of the powerhouse channel, regrade and pull back the eastern side of the 12th Street Landfill, Weyerhaeuser is now working on the cleanup design for the landfill. The reshaping will protect the landfill and prevent erosion when the river is rerouted to its original channel—part of the overall design for the Plainwell Impoundment. EPA expects the design phase to continue through 2008.
- Willow Boulevard/A-Site Landfill will be capped and a monitoring network installed. EPA is working with the responsible parties about designing and implementing a final cleanup plan for the work. The trustees are working to make this a joint agreement.
- A gas collection trench was built along King Highway in late 2007.



Waiting for the
“RI” Report

~9,800 Page Report!

Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site



Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Kalamazoo, Michigan

March 2008

Prepared For: MDEQ
Prepared By: CDM



City-identified Issues

(as expressed in a May 13, 2008 letter to EPA from the City regarding an initial response to the RI)

- **Lack of any discussion in the RI of potential or possible contaminant pathways from OU-1 to the City's subject wellfields** (i.e. existing contaminants, lack of regional flow evaluation, etc.).
- Interpretations and conclusions of **site characterization**.
- **Integrity of existing cap** over materials from Bryant Mill Pond.
- Suitability of using waste material as an “**equivalent**” **landfill liner**.
- Status and effects of **joint sheet piling groundwater collections system**.
- **Impact from the formally Type III permitted landfill** on the Allied site.
- **Appropriate data collection** as part of RI in anticipation of future.
- **Economic development** within OU and the Portage Creek Corridor
- Collection of this **additional information** prior to FS.
- Anticipated Toxic Substances Control Act (TSCA) **waiver** to be issued by the EPA Region V Regional Administrator.

EPA quote from their March 2008 Newsletter:

“EPA met with the city and will be working with them to make sure the study considers all issues deemed important by the city.”

Obviously, that did not happen.

MDEQ Source Water Protection Unit

4-08 Memo Selected Responses RE: RI Report

“The possible migration of contaminants off site, or to depths deeper than those at which the ADS investigation was conducted, cannot be completely ruled out.”

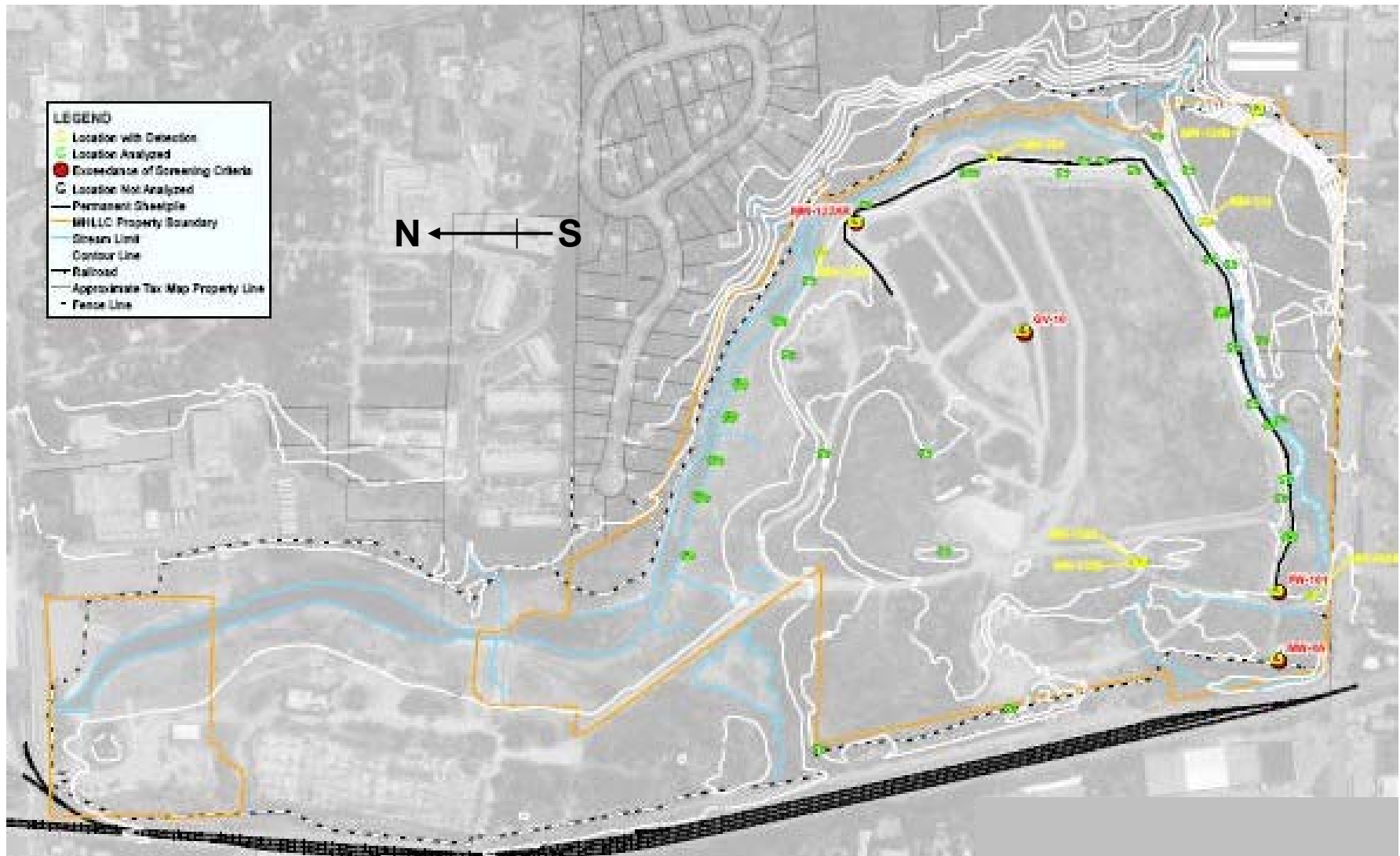
“Little information at the ADS was collected for elevations below 740 ft AMSL....No information at the ADS was obtained on the regional flow system in which city of Kalamazoo wells are completed.”

“The list of contaminants of concern (COC) at the ADS is extensive...” (Detections of PCBs, VOCs, SVOCs, and Inorganics).

“Perhaps of greatest concern is the fact that there are exceedances for inorganics at the western property line. No sampling was conducted beyond the property line to insure there had been no migration of the inorganics off site.”

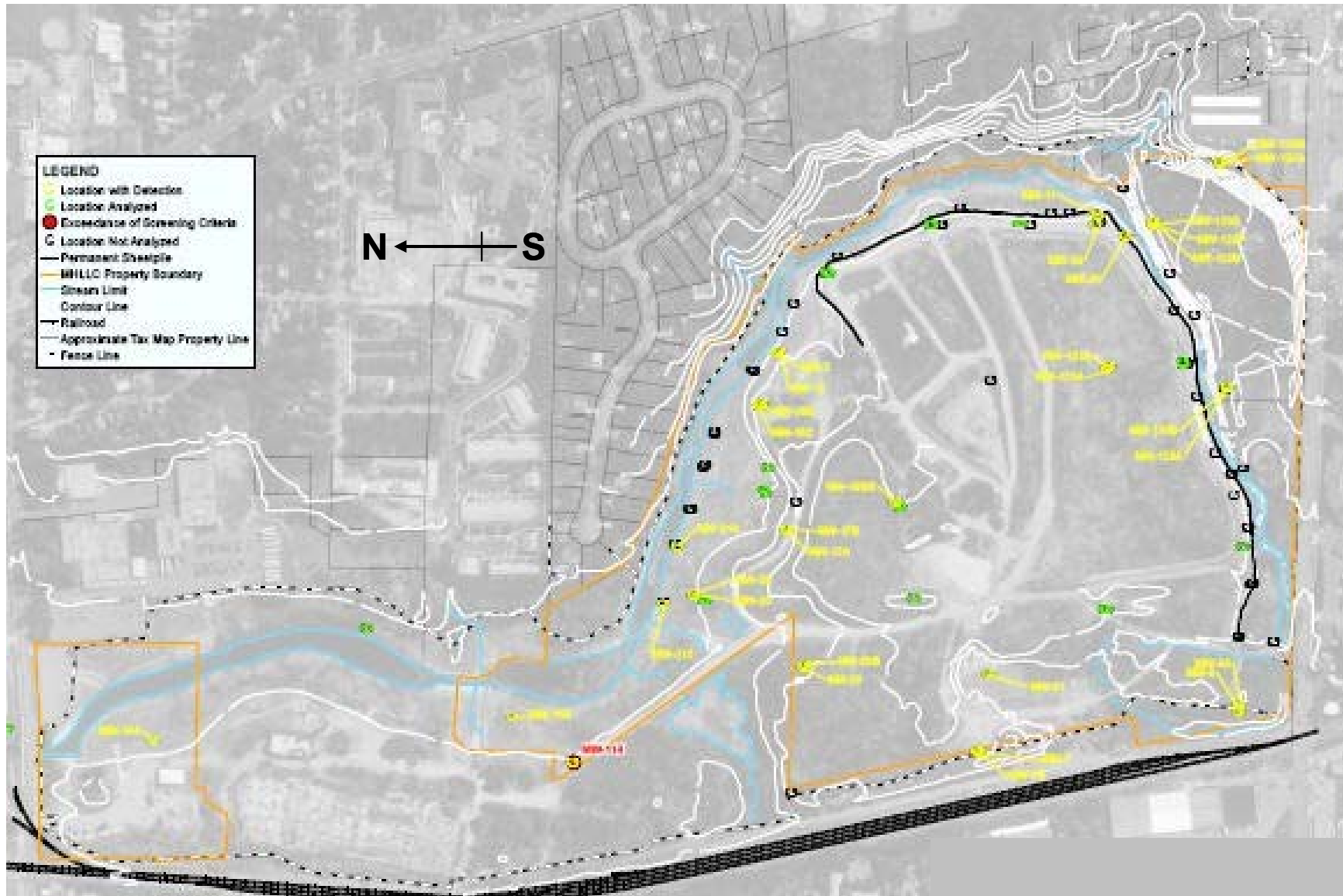
“...it is possible the subtle mounding of groundwater at the site may have pushed chemicals on a more northerly vector. As noted above, the presence of contaminants at unacceptably elevated levels on the north and west boundaries of the site make this a distinct possibility.”

Figure 3: Distribution of PCBs in Ground Water



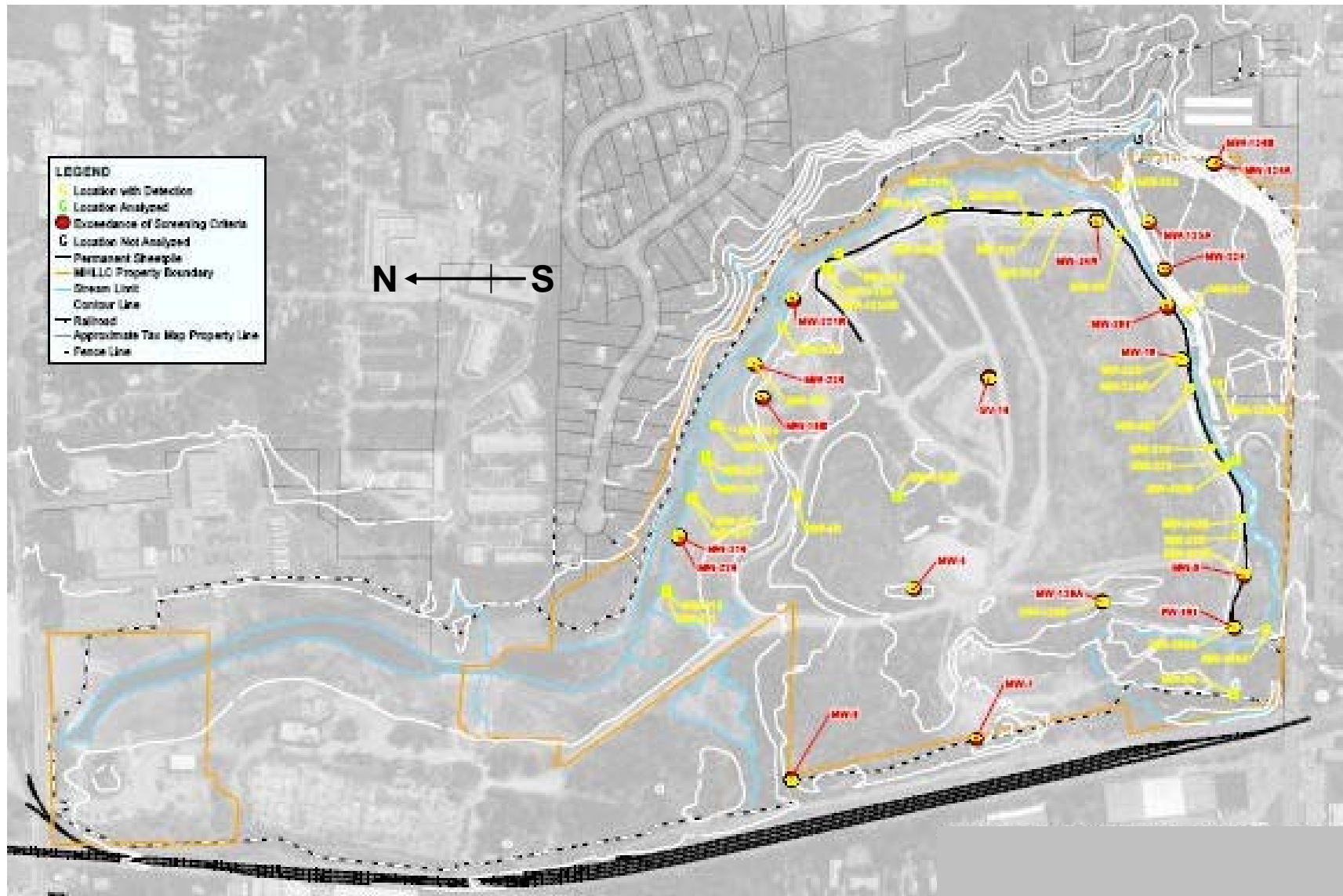
Reproduction of Figure 4-4B from Allied Paper, Inc. Operable Unit Remedial Investigation Report

Figure 4: Distribution of VOCs in Ground Water



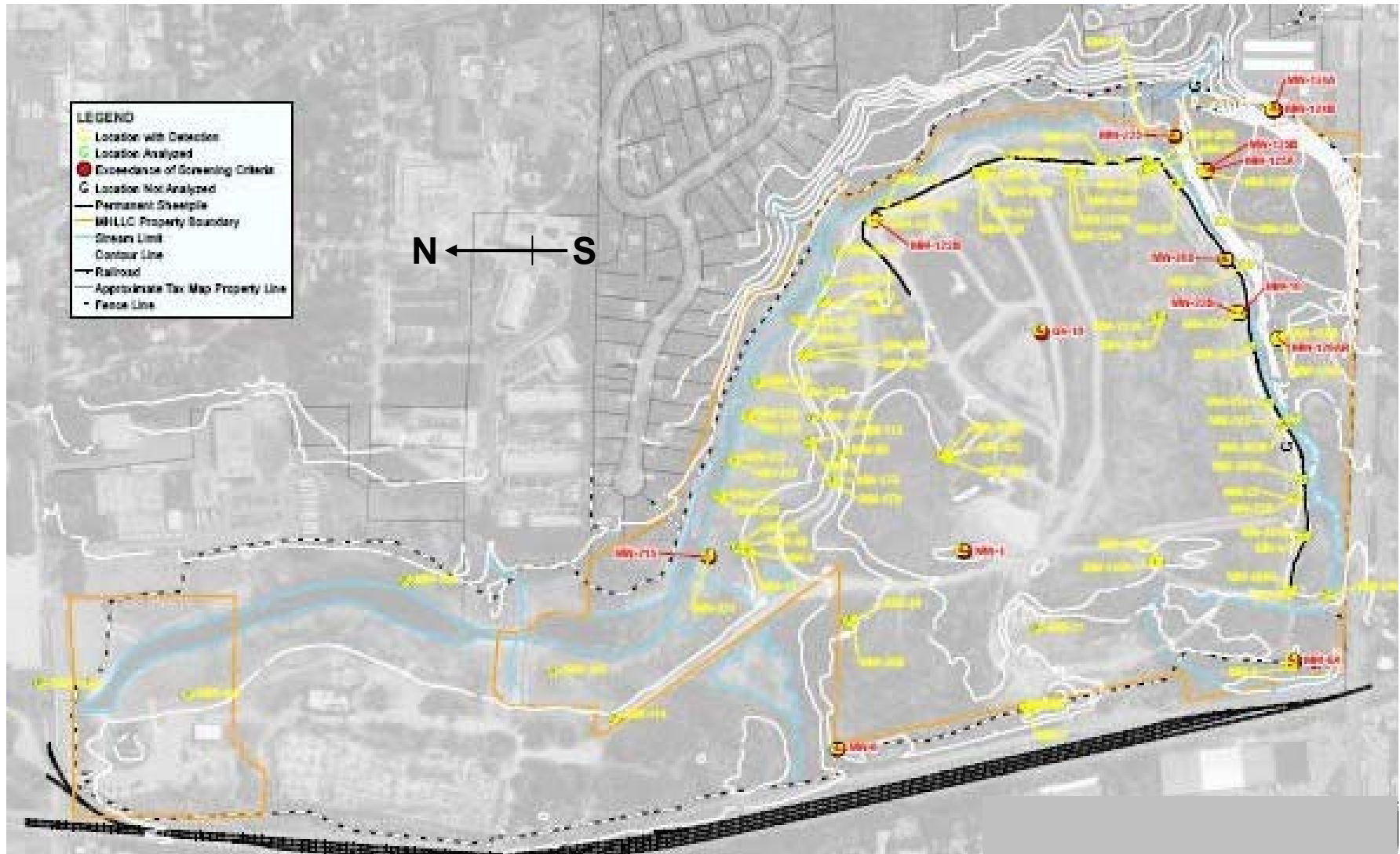
Reproduction of Figure 4-4C from Allied Paper, Inc. Operable Unit Remedial Investigation Report

Figure 5: Distribution of Inorganics in Ground Water



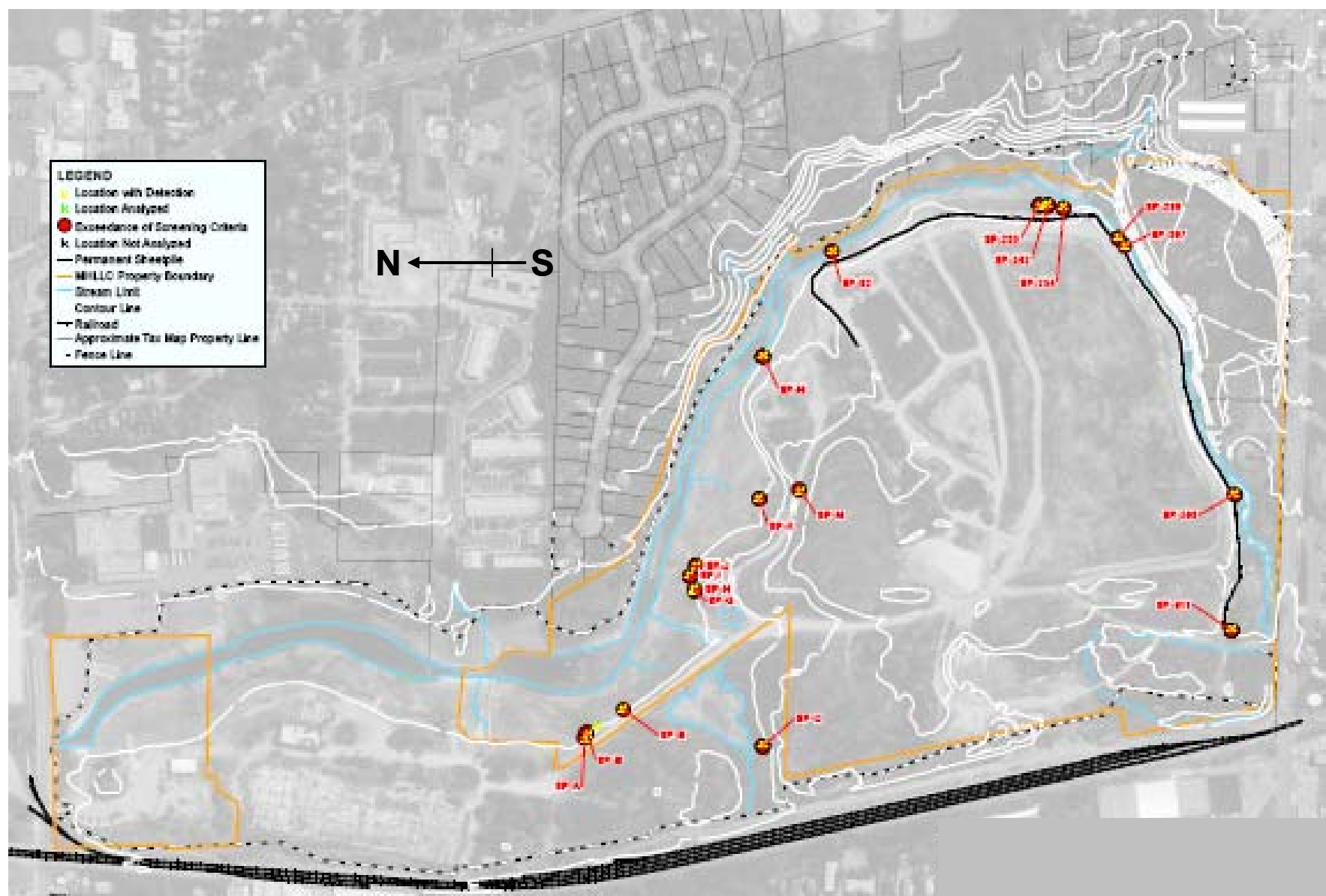
Reproduction of Figure 4-4H from Allied Paper, Inc. Operable Unit Remedial Investigation Report

Figure 6: General Chemistry Parameters



Reproduction of Figure 4-4IB from Allied Paper, Inc. Operable Unit Remedial Investigation Report

Figure 7: Inorganics in Ground Water Seeps



Reproduction of Figure 4-4K from Allied Paper, Inc. Operable Unit Remedial Investigation Report

MDEQ Source Water Protection Unit's Response to Remedial Investigation Report

Recommendations

“It would be beneficial if additional information were collected to the north and west of the ADS.”

- Groundwater sampling at shallow and at depth to insure that migration of contaminants has not occurred beyond the site.
- Collection of SWLs to confirm groundwater flow.
- Installation of sentinel wells to be screened to intercept the probable flow path(s) between the ADS and wells located at Water Pumping Stations 1 and 3. Groundwater flow modeling may need to be conducted to identify the well depths most useful for the purpose of monitoring for contaminant migration.

*Interim Technical Responses to
Allied Paper Operable Unit
Kalamazoo, Michigan
Remedial Investigation Report,
dated March 19, 2008*

Prepared by:

NTH Consultants, Ltd.

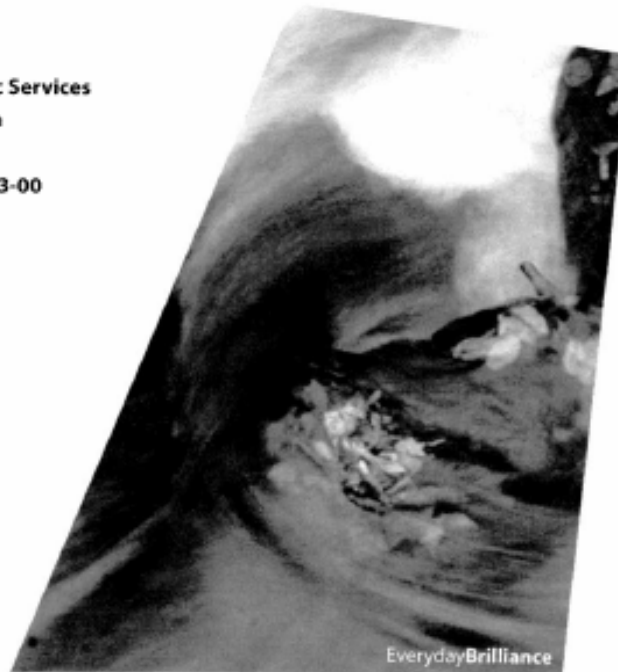
38955 Hills Tech Drive
Farmington Hills, MI 48331
and

City of Kalamazoo -
Environmental Services Division

Prepared For:

City of Kalamazoo
Department of Public Services
Kalamazoo, Michigan

Project No. 13-070773-00
September 17, 2008



EverydayBrilliance

Table of Contents



EXECUTIVE SUMMARY	1
1.0 OVERVIEW	3
2.0 PURPOSE OF REMEDIAL INVESTIGATION	3
3.0 PRIMARY ISSUES OF CONCERN	4
4.0 TECHNICAL REVIEW COMMENTS AND OBSERVATIONS	6
4.1 Wellhead / Water Supply Protection	6
4.2 Overall Site Characterization	8
4.2.1 Groundwater Flow and Recharge	12
4.2.2 Flow Nets	13
4.2.3 Relationship Between Upper and Lower Transmissive Deposits	14
4.2.4 Groundwater Seeps	15
5.0 SHEET PILE WALL AND GROUNDWATER COLLECTION SYSTEM	16
5.1 Sheet Pile Wall	16
5.2 Groundwater / Leachate Collection System Summary	17
5.3 Sheet Pile Wall / Groundwater Collection Performance	18
5.3.1 The "1 foot criterion"	18
5.3.2 Groundwater Elevation, Flow and Seeps	19
5.3.3 POTW Discharge Records	20
6.0 GEOTECHNICAL IMPLICATIONS OF PCB CONTAMINATED RESIDUALS IN OU-1	21
7.0 WASTE RESIDUALS AS LANDFILL LINER MATERIAL	23



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Table of Contents (continued)



8.0 ADDITIONAL CONSIDERATIONS FOR THE FEASIBILITY STUDY	24
8.1 Existing Michigan Hazardous Waste Rules and TSCA Landfill Design Criteria at WDI Site No. 2	24
8.2 Meeting Minimum Standards and Improving OU-1 IIRM Existing Features	25
9.0 CONCLUSIONS AND RECOMMENDATIONS	26



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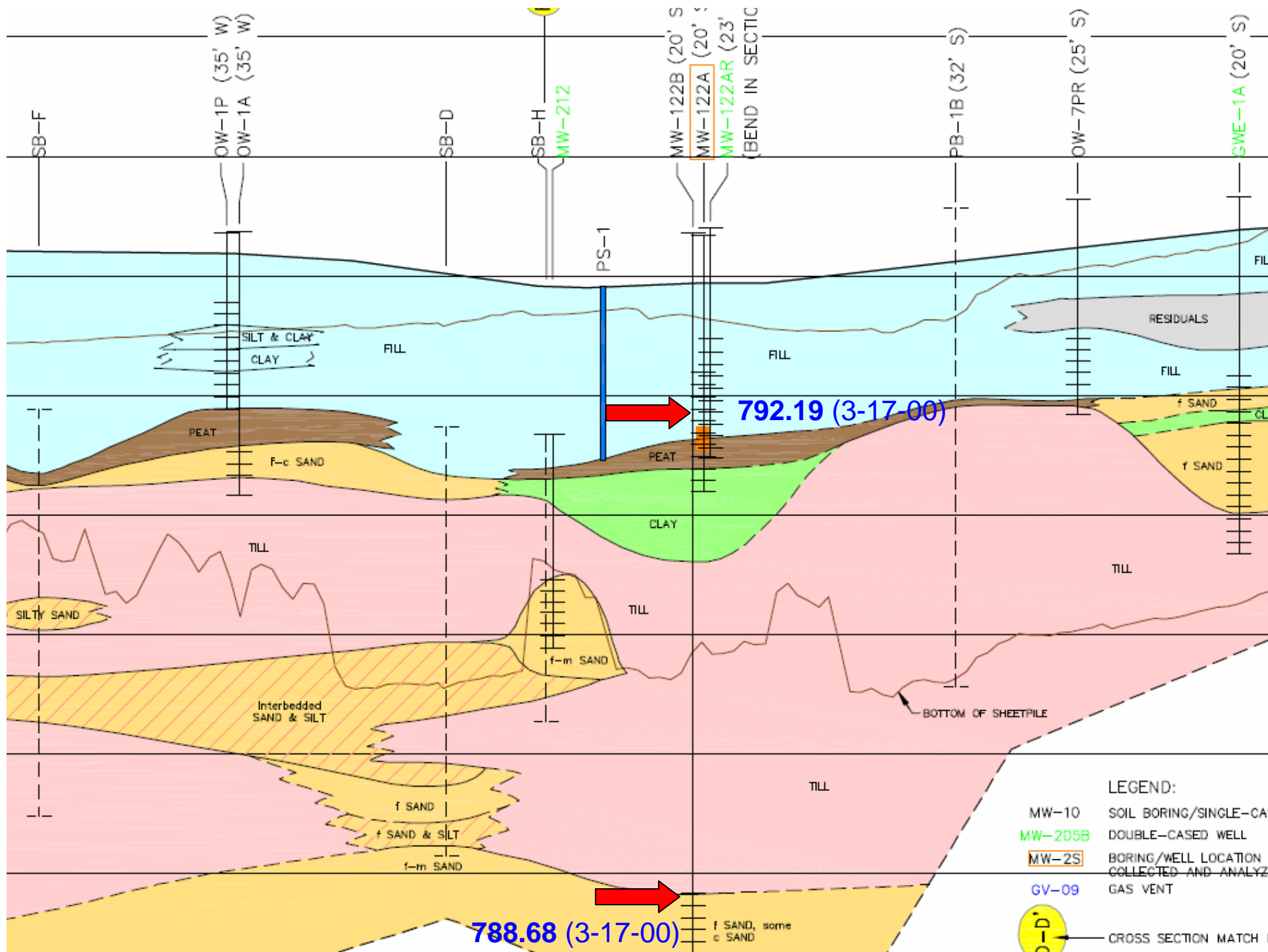
Concerns Identified with the RI: “NTH/COK Interim Technical Response Report”

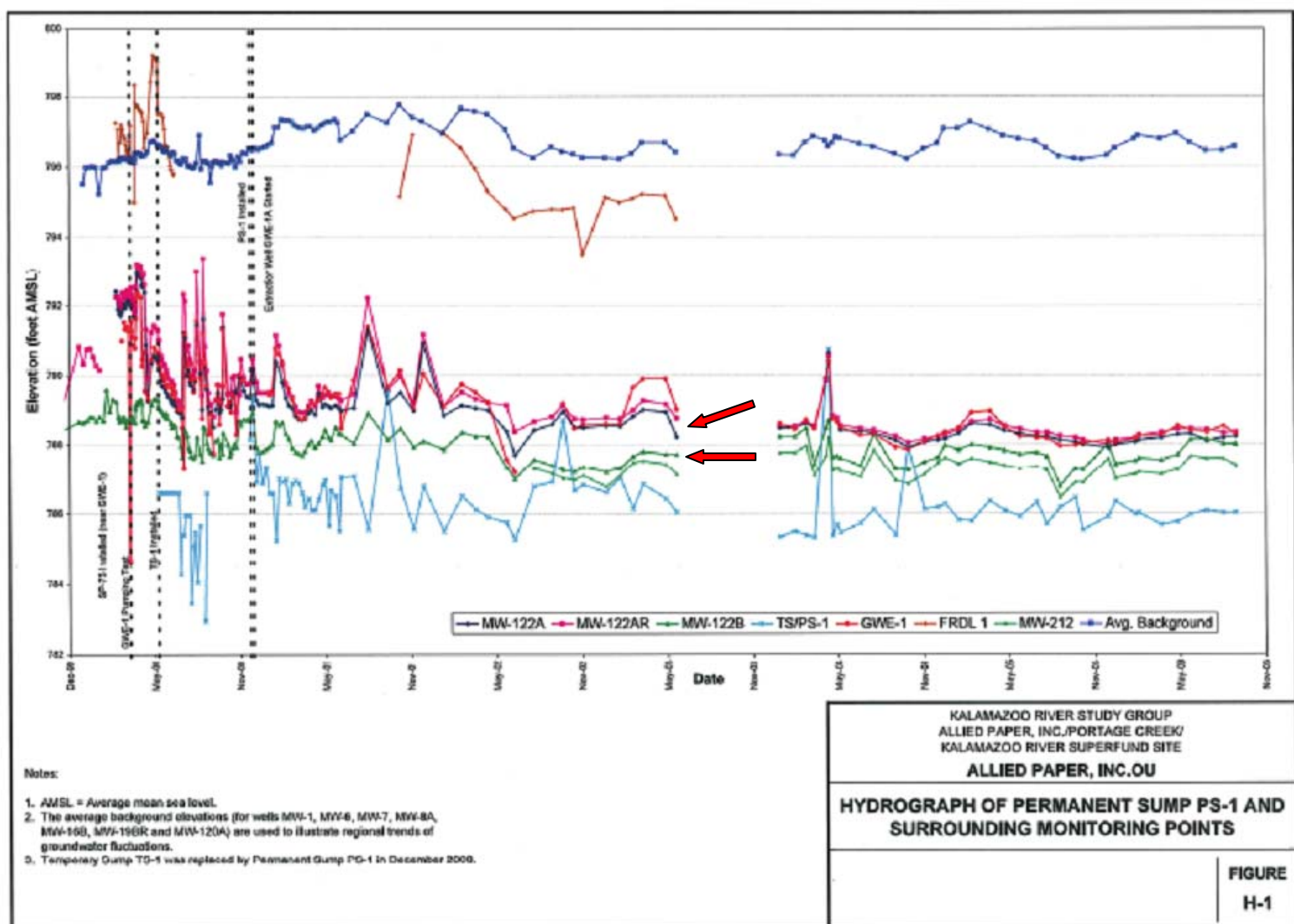
- **The RI Report is deficient in many regards**, including: contradictions to previous findings and opinions of the PRPs and/or regulatory agencies; apparent **bias in spatially sampling** that only covers ~1/3 of site; **use of selective available data/omitting other relevant data**; use of data in draft form; certain data do not match between presentation forms (e.g., tables and figures).
- The RI Report **virtually ignored potential threat to the City’s PWSS.**
- **The IRM measures are ineffective** since the site is characteristic of a “**flow-through**” landfill with groundwater flowing from the western uplands through the site, contacting contaminants, and migrating predominately towards Portage Creek (**uncontrolled**).
- The proposal to use PCB-contaminated residual materials as a liner component of the Remedial design is indefensible – **site should meet standards for hazardous waste disposal.**
- It seems that a “**presumptive remedy**” for this site was made to be similar to the other three landfills that do not have the same characteristics as the Allied Site (OU-1).

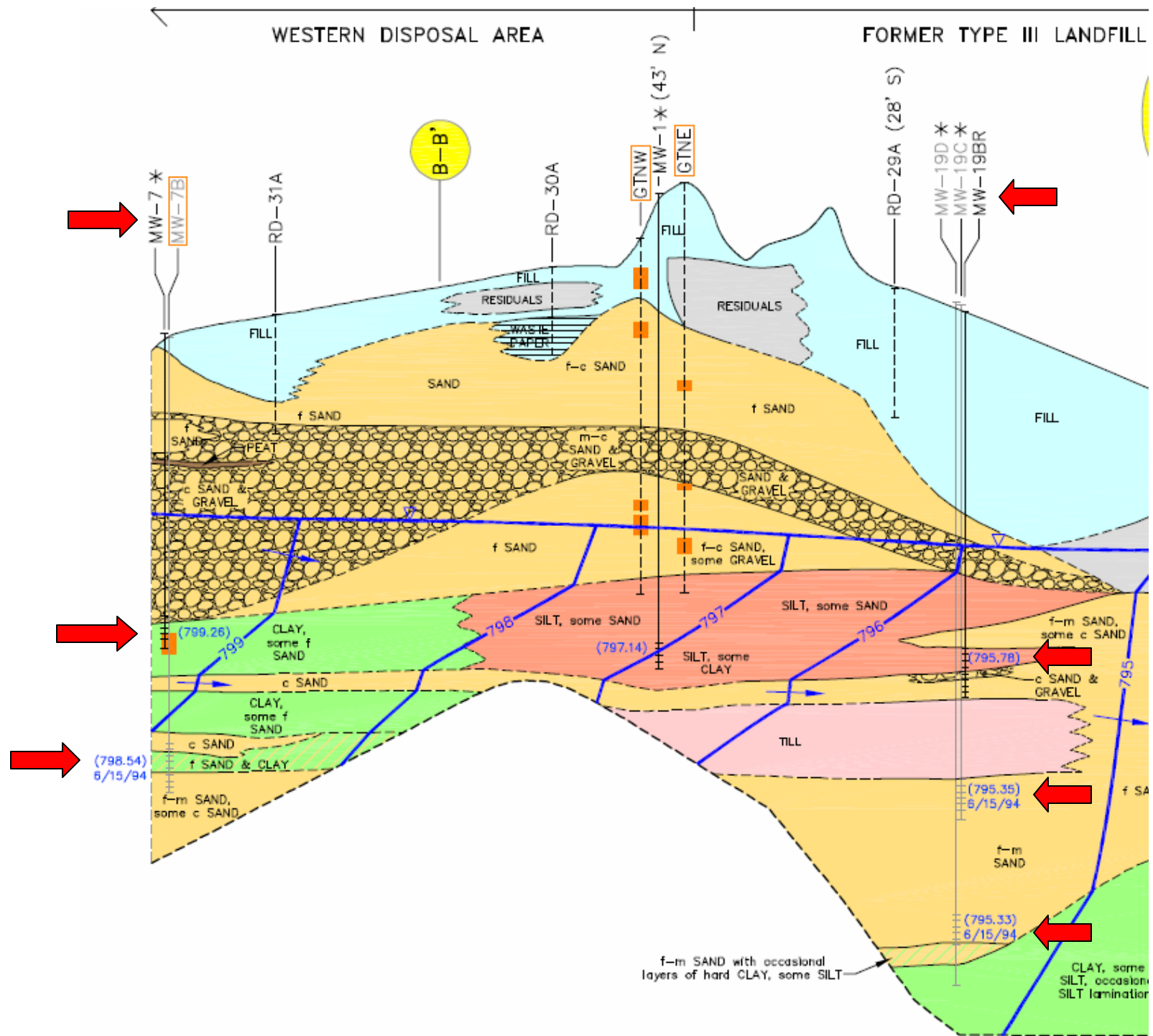
Recommendations from the NTH/COK Interim Technical Response Report

Recommendations

- Prior to the FS stage, address the deficiencies in the RI by **additional investigation** to adequately characterize the site and address the threat to the PWSS by sentinel wells/monitoring.
- “Short of complete waste removal and restoration of waste materials, or immobilization, a complete enclosure of the entire site with a hydraulic barrier, consisting of a vertical soil-bentonite wall, keyed into an impermeable layer, coupled with improved groundwater/leachate collection to create inward gradients, is the preferred final remedial action for OU-1.”







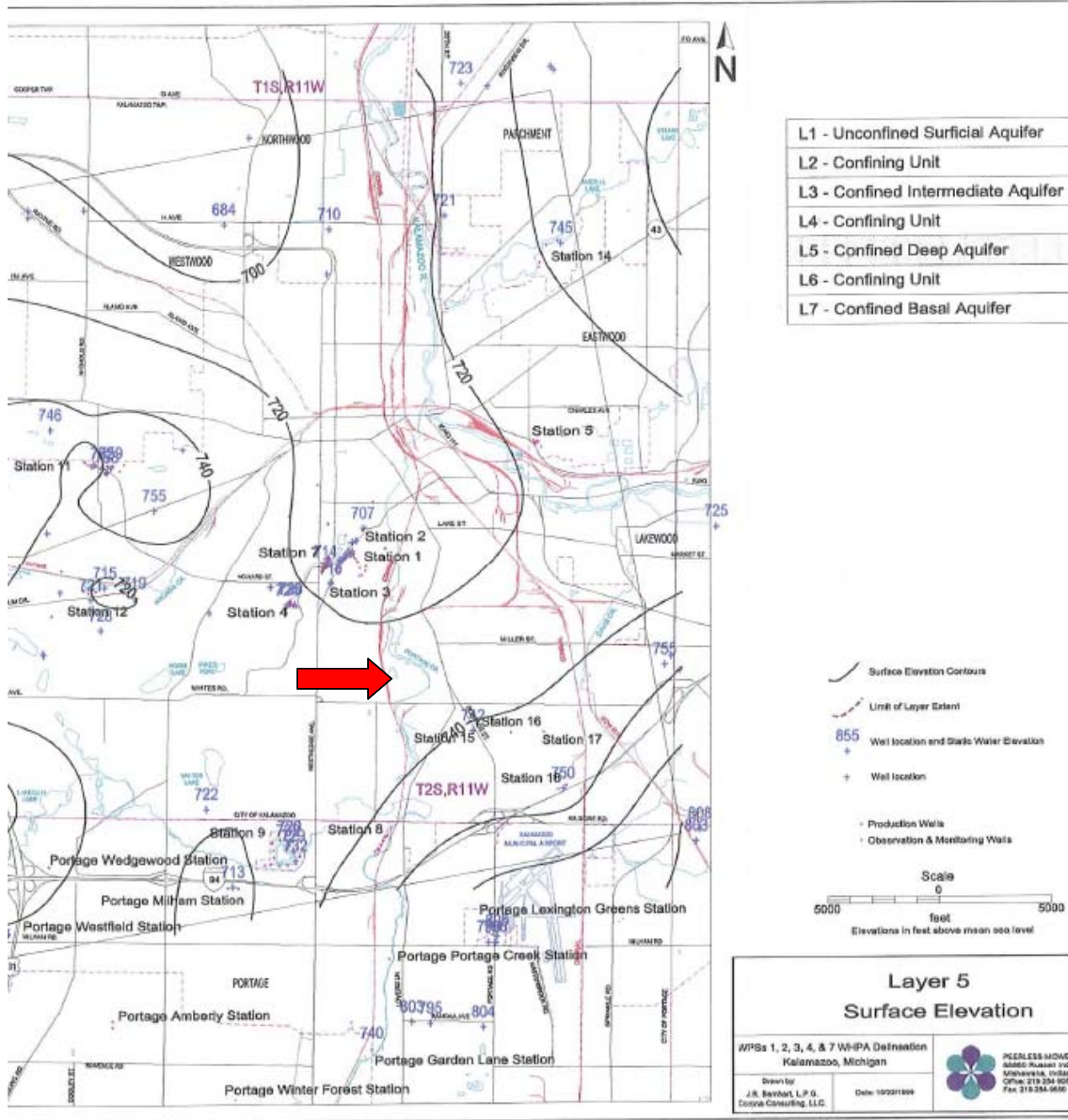


FIGURE 11



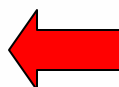
Daily Gazette article

Monday, July 21, 2008

<http://www.dailygazette.com/>
See HTML Version of article

By Bob Conner

PCBs found in Stillwater water supply



STILLWATER — PCBs have been found for the first time in the village's public water supply, according to Mayor Ernest Martin.

"The levels remain well below the New York state maximum contaminant level of 500 nanograms per liter," according to a statement issued by the mayor. "Therefore, the water provided by the village of Stillwater remains potable and well under and within the [state Health Department] standards."

The PCBs were found in tests of village wells by the state Health Department, which did not immediately return a call.

The state was testing the wells as part of a monitoring program in connection with planned dredging of the Hudson River to remove PCB contamination. The massive dredging project, which is scheduled to begin next year, is being done by the U.S. Environmental Protection Agency. It is being paid for by General Electric Co., whose capacitor plants in Hudson Falls and Fort Edward were the original source of the PCBs, or polychlorinated biphenyls, in the river.

The village draws its water from wells near the river, and local leaders have expressed concern that the water supply might be contaminated by the dredging. Prior tests of the wells by the village did not detect PCBs. The village water system also supplies part of the town of Stillwater.

The village will hold an informational meeting on these issues at 7 p.m. July 29 at Stillwater High School.

Under current EPA plans, there is no provision to link Stillwater to the Troy water system or another public supply in the event of contamination.

The EPA is proposing to link Waterford and Halfmoon, which draw their drinking water directly from the Hudson, to the Troy water system.

RECENT DEVELOPMENTS

- In October 2008, **an off-site meeting** between City/NTH staff and PRP's consultant was held in to discuss NTH/City report (only groundwater issue was discussed w/o commitments). Their "Conceptual Site Model" ignored evidence of a downward groundwater potential and thus appears flawed.
- In December 2008, **EPA/CH2MHill released Technical Memorandum** RE: preliminary remedial goals of OU-1.
- A **conference call** was held between EPA, MDEQ and both of their consultants, the City & NTH & ASTI, KRWC, ASTF to discuss Memo and communities concerns/issues with it. EPA committed to a Groundwater Monitoring Plan to address PWSS.
- Working with the Allied Site Task Force, KRWC, the KRCC, and others to ensure that EPA, MDEQ, and the PRP address site issues/concerns.
- Continuing **political pressure** to ensure that the appropriate process is followed and effective remedy is implemented.
- Upon receipt, will review & comment on **Groundwater Monitoring Plan**.
- Prepare for **Feasibility Study (FS)** and formal response to it.

KALAMAZOO GAZETTE



Bankruptcy may threaten river work Firm funding Kalamazoo River cleanup files for Chapter 11

Friday, January 09, 2009

Kalamazoo

Another fight begins?

BY CHRIS KILLIAN

Special to the Gazette

KALAMAZOO -- The nation's souring economy could threaten the future cleanup of the Kalamazoo River, now that the parent company of one of two firms charged with paying for the removal of polychlorinated biphenyls has filed for bankruptcy.

The U.S. arm of chemical giant LyondellBasell Industries -- owner of Millennium Holdings LLC, which along with Georgia Pacific Corp. is financing cleanup projects on the Kalamazoo River -- filed for Chapter 11 bankruptcy protection in New York on Tuesday.

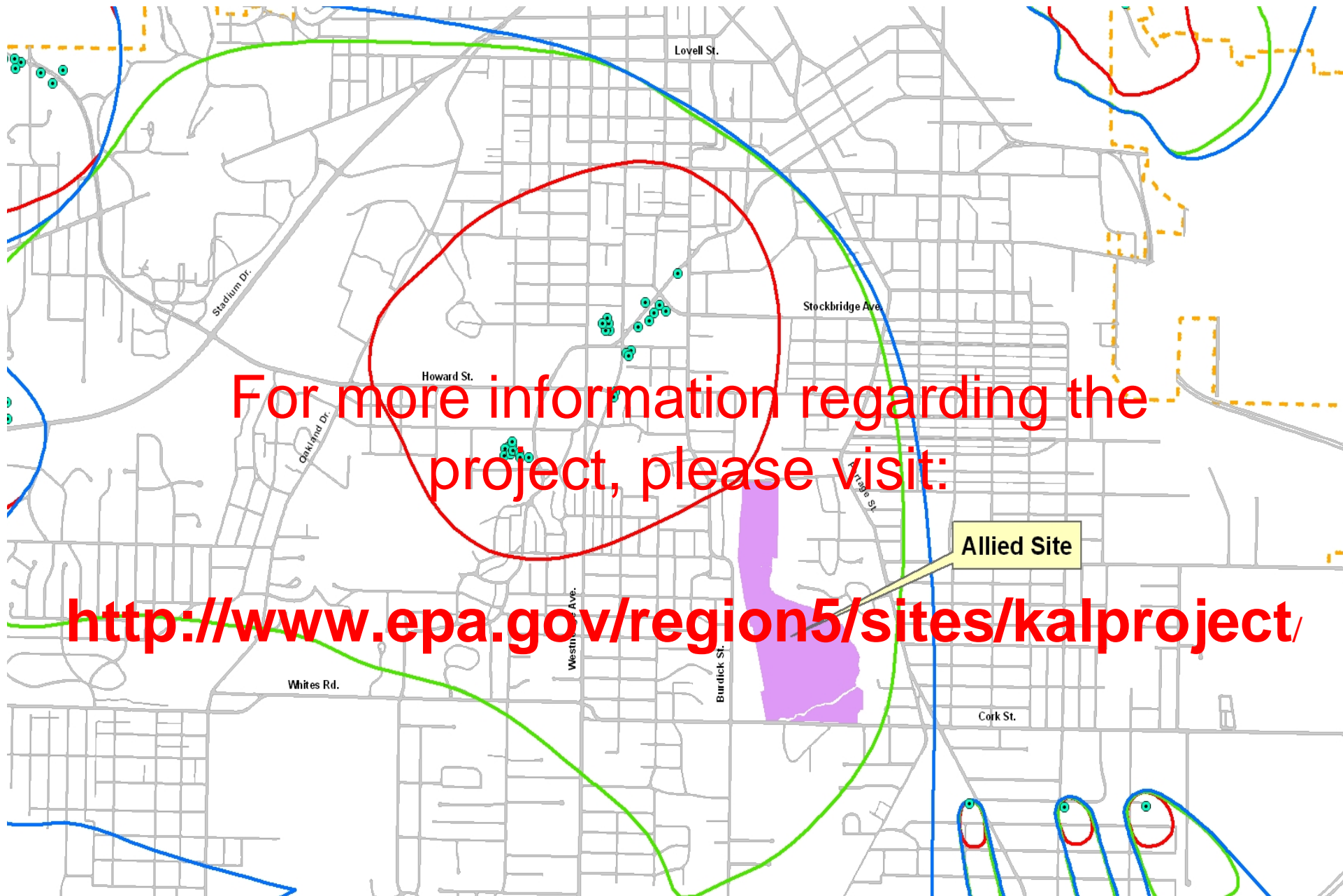
Lyondell Chemical Co. officials said the recession had weakened demand for its products, which are used in everything from cars to detergents.

Dave Roznowski, regional public-relations manager for Lyondell, said Thursday that it's too early to determine what effect the company's filing might have on future cleanup projects.

The company, which acquired Millennium in late 2004, has 20 days from the bankruptcy filing date to look at its cleanup portfolio and assess what can continue to be financed, Roznowski said. He said he didn't know how many cleanup projects the company is currently financing, but he said the Kalamazoo River is its largest cleanup liability.

Work on removing PCBs from riverbanks, flood plains and other areas along a 1.5-mile stretch of the river near Plainwell concluded last month. The \$25 million project -- the first significant cleanup of PCBs from the Kalamazoo River since an 80-mile stretch was declared a Superfund site in 1990 -- began in June 2007.

The Environmental Protection Agency has relied heavily on identifying "potentially responsible parties" -- such as Millennium and Georgia Pacific in the case of the Kalamazoo River -- to finance cleanup of contaminated areas since federal Superfund monies were exhausted several years ago.



For more information regarding the project, please visit:

<http://www.epa.gov/region5/sites/kalproject/>